

**STARK & STARK, P.C.**

A Professional Corporation  
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*Attorneys for Prestige*

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In Re:  DARYL FRED HELLER,  Debtor.	Chapter 11  Case No. 25-11354 (JNP)
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**CERTIFICATION OF JOSEPH H. LEMKIN IN SUPPORT OF PRESTIGE’S (I)  
REPLY TO DEBTOR’S OPPOSITION TO PRESTIGE’S MOTION FOR AN ORDER  
CONFIRMING THAT IT IS NOT STAYED FROM PROCEEDING WITH  
DISCOVERY AND CIVIL CONTEMPT PROCEEDINGS PURSUANT TO 11 U.S.C.  
§362(B)(4), AND (II) OPPOSITION TO CROSS MOTION FOR STAY RELEIF TO  
ALLOW FOR THE PENNSYLVANIA COURT APPEAL TO CONTINUE**

I, Joseph H. Lemkin, Esq., do certify and say:

1. I am an attorney with the law firm of Stark & Stark, Attorneys for Prestige Fund A, LLC, Prestige Fund A IV, LLC, Prestige Fund A IX, LLC, Prestige Fund B, LLC, Prestige Fund B II, LLC, Prestige Fund B IV, LLC, Prestige Fund B V, LLC, Prestige Fund B VI, LLC, Prestige Fund B VII, LLC, Prestige Fund B BTM I, LLC, Prestige Fund A II, LLC, Prestige Fund A V, LLC, Prestige Fund A VI, LLC, Prestige Fund A VII, LLC, Prestige Fund D, LLC, Prestige Fund D III, LLC, Prestige Fund D IV, LLC, Prestige Fund D V, LLC, Prestige Fund D VI, LLC, Prestige Fund D BTM I, LLC, WF Velocity I, LLC, WF Velocity Fund IV, LLC, WF Velocity Fund V, LLC, WF Velocity Fund VI, LLC and WF Velocity Fund VII, LLC (collectively “Prestige”), which has a business address of 100 American Metro Blvd., Hamilton, NJ 08619.

2. I make this Certification in support of Prestige's (I) Reply to Debtor's Opposition to Prestige's Motion for an Order Confirming That it is Not Stayed From Proceeding With Discovery and Civil Contempt Proceedings Pursuant to 11 U.S.C. §362(B)(4), and (II) Opposition to Cross Motion for Stay Relief to Allow for Pennsylvania Court Appeal to Continue.

3. Attached hereto as Exhibit "A" is a true and correct copy of the March 3, 2025 Order entered by the Court of Common Pleas of Lancaster County Pennsylvania in a manner styled as *Prestige Fund A, LLC. et al., vs. Paramount Management Group, LLC* (Docket No. CI-24-06012).

4. Attached hereto as Exhibit "B" is a true and correct copy of Plaintiff's Inventory of Paper Files and Computing Devices Order filed with the Court of Common Pleas of Lancaster County Pennsylvania in a manner styled as *Prestige Fund A, LLC. et al., vs. Paramount Management Group, LLC* (Docket No. CI-24-06012).

5. Attached hereto as Exhibit "C" is a true and correct copy of the April 17, 2025 deposition transcript of Randall Leaman.

6. Attached hereto as Exhibit "D" is a true and correct copy the Affidavit of Daryl Heller in Support of Brief in Opposition to Plaintiff's Petition for Special Injunction and Preliminary Injunction in a manner styled as *Prestige Fund A, LLC. et al., vs. Paramount Management Group, LLC* (Docket No. CI-24-06012).

7. Attached hereto as Exhibit "E" is a true and correct copy of the Deposition Responses of Dennis Ream dated March 24, 2025.

8. Attached hereto as Exhibit "F" is a true and correct copy of text exchanges between Daryl Heller and Randall Leaman dated March 13, 2024 to December 5, 2024.

9. Attached hereto as Exhibit “G” is a true and correct copy of the deposition transcript of Aaron R. Fogleman dated March 31, 2025.

I certify that the foregoing statements made herein are true. I am aware that if any statement made herein is willfully false, I am subject to punishment.

By: /s/ Joseph H. Lemkin  
JOSEPH H. LEMKIN, ESQ.

Dated: April 25, 2025

# **EXHIBIT A**



IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PA  
CIVIL ACTION-LAW

PRESTIGE FUND A, LLC, ET AL.,  
Plaintiffs,

v.

PARAMOUNT MANAGEMENT GROUP,  
LLC,  
Defendant.

No. CI-24-06012

ENTERED AND FILED  
2025 MAR -3 PM 2:20  
PROTHONOTARY'S OFFICE  
LANCASTER, PA.

ORDER

AND NOW, this 3<sup>rd</sup> day of March, 2025, upon  
consideration of Plaintiffs' Motion to Take Custody of Paper Files and Computer  
Devices, it is hereby ORDERED the Motion is GRANTED. It is further ORDERED  
as follows:

1. Robert Z. Horst, manager of Premiere Prince Street, LLC, which is the  
landlord for Paramount Management Company, LLC's former leased space at  
415 North Prince Street, Suite 202, Lancaster, PA 17603 (the Leased Space),  
shall permit Plaintiffs to enter the Leased Space within 14 days of the date of  
this Order, at such date and time as Mr. Horst and Plaintiffs deem mutually  
convenient.
2. Plaintiffs are permitted to do each of the following:
  - a. Enter the Leased Space and take custody of all paper files identified by  
Plaintiffs as potentially relevant to execution on the Judgments in this  
matter (the Records);
  - b. Enter the Leased Space and take custody of all computing devices  
capable of storing files potentially relevant to execution on the  
Judgments in this matter, including, but not limited to, three desktop

computers, one laptop, and two flash drives (collectively, the Computers);

- c. Remove the Records and the Computers to an off-site location of the Plaintiffs' choosing;
- d. Within 60 days of receipt of the Records and the Computers, copy such portion of the Records and the Computers as Plaintiffs deem necessary and permit other interested parties to do the same; and
- e. At the end of the 60-day period, or sooner if Plaintiffs so choose, provide Paramount notice of the right to take custody of the Records and Computers within 14 days; if Paramount does not take custody at the end of the 14-day notice period, Plaintiffs shall be permitted to dispose of the Records and the Computers in any fashion.

f. \*

- 3. By taking possession of the Records and the Computers, Plaintiffs are not assuming any obligation to preserve or otherwise maintain them beyond the period set forth in Paragraph 2(e).

f. File an inventory of all items taken possession of, with the court within sixty (60) days.

BY THE COURT:

*Tahy*

, JUDGE



ATTEST:

*[Signature]*

Copies to: Matthew H. Haverstick, Esq.; Joshua J. Voss, Esq; Samantha G. Zimmer, Esq.; Heidi R. Freese, Esq.; Barbara A. Zemlock, Esq.; Paramount Management Group, LLC; Edmond George, Esq.; Nicholas Poduslenko, Esq.; Michael Vagnoni, Esq.; Sean E. Summers, Esq.

NOTICE OF ENTRY OF ORDER OR DECREE  
PURSUANT TO PA. R.C.P. NO. 238  
NOTIFICATION: THE ATTACHED DOCUMENT  
HAS BEEN FILED IN THE CASE  
PROTHONOTARY OF LANCASTER CO., PA  
DATE: 03/07/25

## **EXHIBIT B**

Matthew H. Haverstick (No. 85072)  
Joshua J. Voss (No. 306853)  
Samantha G. Zimmer (No. 325650)  
KLEINBARD LLC  
Three Logan Square  
1717 Arch Street, 5<sup>th</sup> Floor  
Philadelphia, PA 19103  
Ph: 215-568-2000 | Fax: 215-568-0140  
*Attorneys for Plaintiffs*

IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PA  
CIVIL ACTION-LAW

PRESTIGE FUND A, LLC, ET AL.,	:	
Plaintiffs,	:	No. CI-24-06012
v.	:	
	:	Hon. Leonard G. Brown, III
PARAMOUNT MANAGEMENT GROUP,	:	
LLC,	:	
Defendant.	:	
	:	

PLAINTIFFS’ INVENTORY OF PAPER FILES AND COMPUTING DEVICES

Plaintiffs Prestige Fund A, LLC; Prestige Fund A II, LLC; Prestige Fund A IV, LLC; Prestige Fund A V, LLC; Prestige Fund A VI, LLC; Prestige Fund A VII, LLC; Prestige Fund A IX, LLC; Prestige Fund B, LLC; Prestige Fund B II, LLC; Prestige Fund B IV, LLC; Prestige Fund B V, LLC; Prestige Fund B VI, LLC; Prestige Fund B VII, LLC; Prestige Fund B BTM I, LLC; Prestige Fund D, LLC; Prestige Fund D III, LLC; Prestige Fund D IV, LLC; Prestige Fund D V, LLC; Prestige Fund D VI, LLC; Prestige Fund D BTM I, LLC; WF Velocity I, LLC; WF Velocity Fund IV, LLC; WF Velocity Fund V, LLC; WF Velocity Fund VI, LLC; and WF Velocity Fund VII, LLC (collectively, **the Funds**) respectfully submit this

Inventory of Paper Files and Computing Devices, as required by paragraph 2(f) of the Court's March 3, 2025 Order.

As permitted by the March 3 Order, representatives of the Funds entered 415 North Prince Street, Suite 202, Lancaster, PA 17603 (the Leased Space) on March 13, 2025 to take custody of paper files and computing devices. At the Leased Space, the Funds found, and removed, the following:

1. 2 boxes of paper files from the first floor of the Leased Space;
2. 35 boxes of paper files from the second floor of the Leased Space;
3. 23 boxes of paper files from the basement storage of the Leased Space;
4. 4 laptops;
5. 3 desktop computers; and
6. 2 flash drives.

Respectfully submitted,


Dated: March 17, 2025

  
Matthew H. Haverstick (No. 85072)  
Joshua J. Voss (No. 306853)  
Samantha G. Zimmer (No. 325650)  
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szimmer@kleinbard.com  
*Attorneys for Plaintiffs*

**CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Public Access Policy of the United Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently from non-confidential information and documents.

Dated: March 17, 2025



Matthew H. Haverstick (No. 85072)  
Joshua J. Voss (No. 306853)  
Samantha G. Zimmer (No. 325650)  
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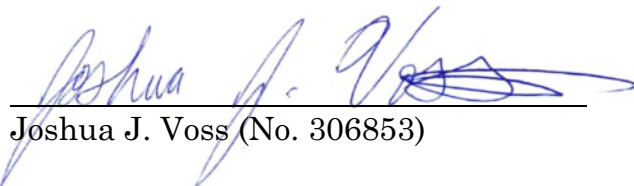


### CERTIFICATE OF SERVICE

I hereby certify that on the date below, I caused a true and correct copy of  
Plaintiffs' Inventory of Paper Files and Computing Devices to be served as follows:

<p>Via U.S. Mail:</p> <p>Paramount Management Group, LLC  415 North Prince Street, Suite 202  Lancaster, PA 17603</p> <p>and</p> <p>Paramount Management Group, LLC  c/o Heller Capital Group, LLC  415 North Prince Street, Suite 200  Lancaster, PA 17603</p>	<p>Via Email to:</p> <p>Heidi R. Freese, Esq.  Barbara A. Zemlock, Esq.  TUCKER ARENSBURG, P.C.  300 Corporate Center Drive, Suite 200  Camp Hill, PA 17011  <a href="mailto:hfreese@tuckerlaw.com">hfreese@tuckerlaw.com</a>  <a href="mailto:bzemlock@tuckerlaw.com">bzemlock@tuckerlaw.com</a>  <i>Counsel for Daryl Heller</i></p>
<p>Via Email to:</p> <p>Edmond George, Esq.  Nicholas Poduslenko, Esq.  Michael Vagnoni, Esq.  OBERMAYER REBMANN MAXWELL  &amp; HIPPEL LLP  Centre Square West  1500 Market Street, Suite 3400  Philadelphia, PA 19102  <a href="mailto:Edmond.George@obermayer.com">Edmond.George@obermayer.com</a>  <a href="mailto:Nicholas.Poduslenko@obermayer.com">Nicholas.Poduslenko@obermayer.com</a>  <a href="mailto:Michael.Vagnoni@obermayer.com">Michael.Vagnoni@obermayer.com</a>  <i>Counsel for Intervenor Customers Bank</i></p>	<p>Via Email to:</p> <p>Sean E. Summers, Esq.  SUMMERS NAGY LAW OFFICES  35 South Duke Street  York, PA 17401  <a href="mailto:ssummers@summersnagy.com">ssummers@summersnagy.com</a>  <i>Counsel for Intervenor Traditions Bank</i></p>

Dated: March 17, 2025

  
Joshua J. Voss (No. 306853)

# **EXHIBIT C**



PRESTIGE FUND A, LLC, :  
et al, :  
 :  
Plaintiff :  
 :  
vs. :  
 : No. CI-24-06012  
PARAMOUNT MANAGEMENT :  
GROUP, LLC, :  
 :  
Defendant :

Deposition of RANDALL LEAMAN  
taken pursuant to notice at the law offices of  
Brubaker, Connoughton, Goss & Lucarelli, LLC,  
480 New Holland Avenue, Suite 6205, Lancaster,  
Pennsylvania, beginning at 10:02 a.m. on April  
17, 2025, before Allen S. Blank, Registered  
Merit Reporter and Notary Public.

ALLEN S. BLANK, RMR  
COURT REPORTER-NOTARY PUBLIC  
90 Mt. Pleasant Road, Paradise, PA 17562  
(717) 687-8942  
arblank@juno.com

COUNSEL PRESENT:

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For - Plaintiff

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973-577-1812  
tmurphy@greenbaumlaw.com

For - Witness Randall Leaman

## INDEX

E X H I B I T S

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## STIPULATION

It is hereby stipulated by and between counsel for the respective parties that signing, sealing, certification and filing are hereby waived; and that all objections except as to the form of the question are reserved to the time of trial.

RANDALL LEAMAN,

the deponent herein, having first been  
duly sworn on oath, was examined and  
testified as follows:

## EXAMINATION

BY MR. VOSS:

Q. Good morning, Mr. Leaman. My name is Joshua Voss. I represent the plaintiffs, Prestige Fund A versus Paramount Management Group. And we're here today to conduct a deposition.

**A. Yes.**

**Q.** Have you been deposed before?

**A. One time a long time ago.**

Q. Okay. So I'll give you some real quick instructions that at least suit my purposes.

<div>5</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 14 of 810</div> <div>1 <b>A. Okay.</b></div> <div>2 <b>Q.</b> Maybe others will tell it to you</div> <div>3 differently.</div> <div>4 So you'll see my right there is</div> <div>5 a court report. To your left. You'll see he</div> <div>6 is typing as I talk. So he will do the same</div> <div>7 for you. What's required for him to do a good</div> <div>8 job for us is that one of us speaks at a time.</div> <div>9 <b>A. Okay.</b></div> <div>10 <b>Q.</b> Even if you know what I'm going to</div> <div>11 ask, you know what the end of my sentence is</div> <div>12 going to be, pause until I'm done.</div> <div>13 <b>A. Okay.</b></div> <div>14 <b>Q.</b> So he can write it down.</div> <div>15 The other thing is, all our</div> <div>16 responses need to be oral and aloud so I can</div> <div>17 hear them. So head shakes don't show up on</div> <div>18 the transcript. So I need you to say yes. I</div> <div>19 need you to say no.</div> <div>20 If you don't understand my</div> <div>21 question, please ask me to clarify. I'm</div> <div>22 generally looking for facts here today, which</div> <div>23 means, unless I tell you I want a guess, don't</div> <div>24 guess.</div> <div>25 <b>A. Okay.</b></div>	<div>7</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 14 of 810</div> <div>2 <b>A. Yes.</b></div> <div>2 <b>Q.</b> The subpoena to testify?</div> <div>3 <b>MR. MURPHY:</b> Let him finish</div> <div>4 before you answer. Everyone does it.</div> <div>5 <b>THE WITNESS:</b> All right.</div> <div>6 <b>BY MR. VOSS:</b></div> <div>7 <b>Q.</b> It's counterintuitive to ordinary</div> <div>8 human conversation.</div> <div>9 <b>A. Understood.</b></div> <div>10 <b>Q.</b> But for him, we got to wait.</div> <div>11 All right. So let me talk about</div> <div>12 your prep for today. Did you prepare before</div> <div>13 you came to this deposition?</div> <div>14 <b>A. Yes.</b></div> <div>15 <b>Q.</b> Who prepared you?</div> <div>16 <b>A. My attorney.</b></div> <div>17 <b>Q.</b> Was there anyone else in the room?</div> <div>18 <b>A. No.</b></div> <div>19 <b>Q.</b> Okay. Did you look at documents in</div> <div>20 preparation for today?</div> <div>21 <b>A. I did.</b></div> <div>22 <b>Q.</b> Okay. What documents did you look at?</div> <div>23 <b>A. The documents requested in the</b></div> <div>24 <b>subpoena.</b></div> <div>25 <b>Q.</b> Okay. Did you look at any other</div>
<div>6</div> <div>1 <b>Q.</b> If I call for an estimate, however,</div> <div>2 I'm asking for an educated estimate.</div> <div>3 <b>A. Okay.</b></div> <div>4 <b>Q.</b> You understand that?</div> <div>5 <b>A. Understood.</b></div> <div>6 <b>Q.</b> Okay.</div> <div>7 Are you under the impairment of</div> <div>8 any drugs or alcohol or any medication that</div> <div>9 would impede your ability to give honest and</div> <div>10 complete answers?</div> <div>11 <b>A. No.</b></div> <div>12 <b>Q.</b> Very good. All right.</div> <div>13 So I'll just start by marking an</div> <div>14 exhibit.</div> <div>15 (Leaman Deposition Exhibit No.</div> <div>16 1 was marked for identification.)</div> <div>17 <b>BY MR. VOSS:</b></div> <div>18 <b>Q.</b> We've previously marked this as</div> <div>19 Plaintiff's Exhibit 1. And I'll identify for</div> <div>20 the record this is a subpoena to testify.</div> <div>21 Mr. Leaman, have you seen that</div> <div>22 before today?</div> <div>23 <b>A. Yes.</b></div> <div>24 <b>Q.</b> Okay. And is that why you're here</div> <div>25 today?</div>	<div>8</div> <div>1 documents?</div> <div>2 <b>A. I'm not sure I understand the</b></div> <div>3 <b>question.</b></div> <div>4 <b>Q.</b> Did you, for example, look at a profit</div> <div>5 and loss statement?</div> <div>6 <b>A. In conjunction with pulling the</b></div> <div>7 <b>information for this. Whatever I provided is</b></div> <div>8 <b>what I looked at.</b></div> <div>9 <b>Q.</b> Okay. So other than your production,</div> <div>10 which we received from your counsel, you</div> <div>11 didn't look at any other documents to prepare</div> <div>12 you for your testimony today?</div> <div>13 <b>A. No.</b></div> <div>14 <b>Q.</b> Okay. Very good.</div> <div>15 Did you talk to Daryl Heller</div> <div>16 about this deposition?</div> <div>17 <b>A. No.</b></div> <div>18 <b>Q.</b> Did you talk to anyone else about this</div> <div>19 deposition?</div> <div>20 <b>A. My wife is aware that I'm having a</b></div> <div>21 <b>deposition.</b></div> <div>22 <b>Q.</b> Fair. Anyone else?</div> <div>23 <b>A. My children are aware that I'm having</b></div> <div>24 <b>a deposition.</b></div> <div>25 <b>Q.</b> How about any former employees of</div>

<div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 15 of 810</div> <div>9 Certification in Support</div> <p>1 Paramount?</p> <p>2 <b>A. No.</b></p> <p>3 <b>Q.</b> Any former officers?</p> <p>4 <b>A. No.</b></p> <p>5 <b>Q.</b> Anybody within the Heller universe of</p> <p>6 entities?</p> <p>7 <b>A. No.</b></p> <p>8 <b>Q.</b> Very good.</p> <p>9 Mr. Leaman, where are you</p> <p>10 currently employed?</p> <p>11 <b>A. I am unemployed.</b></p> <p>12 <b>Q.</b> Okay. Did you for a time work at</p> <p>13 Paramount?</p> <p>14 <b>A. Yes.</b></p> <p>15 <b>Q.</b> And describe for me when you started</p> <p>16 there and then when you ended and we'll go</p> <p>17 from there?</p> <p>18 <b>A. Okay. I started on November 1, 2011,</b></p> <p>19 <b>ended December 12th, 2024.</b></p> <p>20 <b>Q.</b> And starting in 2011 and rolling</p> <p>21 forward, can you tell me your titles at</p> <p>22 Paramount?</p> <p>23 <b>A. When I first started in 2011, I was</b></p> <p>24 <b>COO, chef operating officer. I may have also</b></p> <p>25 <b>been CFO at the time. I don't think I was. I</b></p>	<div>11</div> <p>1 <b>biweekly basis as a result of that. It was a</b></p> <p>2 <b>fixed amount. It was a salary.</b></p> <p>3 <b>Q.</b> What was your fixed amount in 2024?</p> <p>4 <b>A. I think it was 352,000.</b></p> <p>5 <b>Q.</b> For the whole year?</p> <p>6 <b>A. Yes.</b></p> <p>7 <b>Q.</b> And did you receive all of that money?</p> <p>8 <b>A. I did not.</b></p> <p>9 <b>Q.</b> What did you receive?</p> <p>10 <b>A. I don't know. It would have been -- I</b></p> <p>11 <b>would have received compensation through the</b></p> <p>12 <b>time of my termination of my employment. I</b></p> <p>13 <b>don't know what that amount was.</b></p> <p>14 <b>Q.</b> Well, how often were you paid?</p> <p>15 <b>A. Every two weeks.</b></p> <p>16 <b>Q.</b> Okay. And what was your biweekly</p> <p>17 payment?</p> <p>18 <b>A. I don't know. I'd have to calculate.</b></p> <p>19 <b>I don't have it. I never really looked at it</b></p> <p>20 <b>that way.</b></p> <p>21 <b>Q.</b> Okay. Did you receive any bonuses in</p> <p>22 2024?</p> <p>23 <b>A. Yes, I did.</b></p> <p>24 <b>Q.</b> Okay. And how much was that?</p> <p>25 <b>A. I don't remember the exact amount.</b></p>
<div>10</div> <p>1 <b>don't remember.</b></p> <p>2 <b>I moved to president at some</b></p> <p>3 <b>point in that process. And in 2022, I moved</b></p> <p>4 <b>to CEO.</b></p> <p>5 <b>Q.</b> If it changed over time, we'll cover</p> <p>6 it over time.</p> <p>7 How were you paid? Did you get</p> <p>8 a draw? Did you get a salary? How were you</p> <p>9 paid?</p> <p>10 <b>A. I got a salary. But I think the way</b></p> <p>11 <b>the structure was, for a while it was</b></p> <p>12 <b>considered a guaranteed payment. I'm not sure</b></p> <p>13 <b>exactly from an accounting standpoint how that</b></p> <p>14 <b>was handled.</b></p> <p>15 But at various points I was</p> <p>16 either a W-2 or I was given a guaranteed</p> <p>17 payment as a partner of the company.</p> <p>18 <b>Q.</b> Let's focus on 2024. What was your</p> <p>19 payment structure in 2024?</p> <p>20 <b>A. That was W-2 income.</b></p> <p>21 <b>Q.</b> And when you say guaranteed payment,</p> <p>22 what do you mean?</p> <p>23 <b>A. I don't know what that is. That's an</b></p> <p>24 <b>accounting term that the accountants used.</b></p> <p>25 <b>And then I would just get my compensation on a</b></p>	<div>12</div> <p>1 <b>Can I estimate?</b></p> <p>2 <b>Q.</b> Please do.</p> <p>3 <b>A. Yes. \$70,000, roughly.</b></p> <p>4 <b>Q.</b> And when did you receive that bonus?</p> <p>5 <b>A. I believe in May.</b></p> <p>6 <b>Q.</b> Is the \$70,000 bonus, estimated, on</p> <p>7 top of the 352,000 that you expected to</p> <p>8 receive for the year or is that included</p> <p>9 within that?</p> <p>10 <b>A. No. That's on top of that.</b></p> <p>11 <b>Q.</b> On top.</p> <p>12 What were you paid in 2023?</p> <p>13 <b>A. I don't recall. I believe -- and I'm</b></p> <p>14 <b>going to estimate.</b></p> <p>15 <b>Q.</b> Please do.</p> <p>16 <b>A. 330,000.</b></p> <p>17 <b>Q.</b> What about bonuses? Did you receive a</p> <p>18 bonus in 2023?</p> <p>19 <b>A. I did. But I do not remember what it</b></p> <p>20 <b>was.</b></p> <p>21 <b>Q.</b> Are you able to estimate that?</p> <p>22 <b>A. Not accurately, no.</b></p> <p>23 <b>Q.</b> When you say you earned 330,000,</p> <p>24 approximately, in 2023, is that inclusive of</p> <p>25 the bonus?</p>

<div>13</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 16 of 810</div> <div>1 <b>A. No.</b></div> <div>2 <b>Q.</b> So on top of that you earned a bonus?</div> <div>3 <b>A. Yes. But it was far less than the</b></div> <div>4 <b>70,000. I know that.</b></div> <div>5 <b>Q.</b> How about 2022? What did you earn?</div> <div>6 <b>A. I don't know. I don't remember.</b></div> <div>7 <b>Q.</b> Can you approximate?</div> <div>8 <b>A. Not accurately.</b></div> <div>9 <b>Q.</b> Okay.</div> <div>10 <b>A. It would be less than the -- less than</b></div> <div>11 <b>what I earned. I got -- every year I got two</b></div> <div>12 <b>percent increases like everybody else did.</b></div> <div>13 <b>Q.</b> Fair.</div> <div>14 Did you receive a bonus in 2022?</div> <div>15 <b>A. I don't recall.</b></div> <div>16 <b>Q.</b> I was going to ask you about 2021.</div> <div>17 But given we had a lot of guesses with 2022, I</div> <div>18 guess we would have a lot of guesses.</div> <div>19 <b>A. You would have a lot of guesses, yes.</b></div> <div>20 <b>Q.</b> Fair enough. All right.</div> <div>21 Did you travel anywhere in 2024</div> <div>22 that was paid for by Paramount?</div> <div>23 <b>A. Yes.</b></div> <div>24 <b>Q.</b> Where did you go?</div> <div>25 <b>A. I went to I believe a trade show in</b></div>	<div>15</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 16 of 810</div> <div>1 <b>A. I don't know. My cost?</b></div> <div>2 <b>Q.</b> Paramount's cost.</div> <div>3 <b>A. I would guess around \$10,000.</b></div> <div>4 <b>Q.</b> How about the other trade show that</div> <div>5 you're not sure when it was, what do you</div> <div>6 estimate?</div> <div>7 <b>A. I would assume about the same.</b></div> <div>8 <b>Q.</b> And you believe that one was in</div> <div>9 February?</div> <div>10 <b>A. I just don't know. And I can't tell</b></div> <div>11 <b>you confidently that it was in that. It could</b></div> <div>12 <b>have been the fall of '23. So I don't know</b></div> <div>13 <b>the answer.</b></div> <div>14 <b>Q.</b> Okay. Let's talk about the trip to</div> <div>15 Costa Rica. How much did Paramount pay for</div> <div>16 that?</div> <div>17 <b>A. I don't recall. \$30,000, 40,000. I'm</b></div> <div>18 <b>not sure. It was a donation thing.</b></div> <div>19 <b>Q.</b> When was it paid for?</div> <div>20 <b>A. I think in the fall of '23.</b></div> <div>21 <b>Q.</b> Paid for in the fall of '23 but trip</div> <div>22 taken in 2024?</div> <div>23 <b>A. Correct.</b></div> <div>24 <b>Q.</b> Who all went on that trip?</div>
<div>14</div> <div>1 <b>March. Maybe two trade shows.</b></div> <div>2 <b>Q.</b> Where were they?</div> <div>3 <b>A. One was in -- I think it was Las</b></div> <div>4 <b>Vegas. And then I went on a trip for -- it</b></div> <div>5 <b>was Paramount had purchased a, at the Horizon</b></div> <div>6 <b>gala, had purchased a trip to Costa Rica. And</b></div> <div>7 <b>I went on a trip to Costa Rica in March as a</b></div> <div>8 <b>donation to the clarity. So I had purchased</b></div> <div>9 <b>that.</b></div> <div>10 <b>Q.</b> We'll go through each of those.</div> <div>11 You said you went to two trade</div> <div>12 shows. One was Las Vegas. Where was the</div> <div>13 other?</div> <div>14 <b>A. I don't recall. I know there was -- I</b></div> <div>15 <b>know there was an industry trade show that I</b></div> <div>16 <b>went to. I believe that was in March in Vegas</b></div> <div>17 <b>for, yeah, I don't recall exactly. Either an</b></div> <div>18 <b>ATMIA or NAC. I know I went to a trade show</b></div> <div>19 <b>then. And I also, I think I went to a trade</b></div> <div>20 <b>show in February. But I don't recall if it</b></div> <div>21 <b>was then or in '23.</b></div> <div>22 I know they were pushing things</div> <div>23 around a bit and I don't recall my schedule.</div> <div>24 I don't have it, a calendar of it.</div> <div>25 <b>Q.</b> What do you estimate the cost was to</div>	<div>16</div> <div>1 <b>A. It would have been Dennis Ream, our</b></div> <div>2 <b>CFO, and Steve Gernes, our president.</b></div> <div>3 <b>Q.</b> Any other travel in 2024 that</div> <div>4 Paramount paid for?</div> <div>5 <b>A. I went to the -- we had an office in</b></div> <div>6 <b>Jackson, Mississippi. And I flew to Jackson,</b></div> <div>7 <b>Mississippi, to meet with our employees.</b></div> <div>8 <b>Q.</b> Anything else?</div> <div>9 <b>A. Not that I recall.</b></div> <div>10 <b>Q.</b> Okay. Were you in Liberia at some</div> <div>11 point in 2024?</div> <div>12 <b>A. Liberia?</b></div> <div>13 <b>Q.</b> Yeah.</div> <div>14 <b>A. Where is Liberia?</b></div> <div>15 <b>Q.</b> It's in Africa.</div> <div>16 <b>A. No.</b></div> <div>17 <b>Q.</b> Regarding Paramount. Did you have an</div> <div>18 ownership stake in Paramount?</div> <div>19 <b>A. Yes.</b></div> <div>20 <b>Q.</b> Okay. When did you first get a stake</div> <div>21 in the company?</div> <div>22 <b>A. When I first started employment, I</b></div> <div>23 <b>received five percent. Because my</b></div> <div>24 <b>compensation was lower at that time.</b></div> <div>25 <b>Q.</b> And this is in 2011?</div>

<div>17</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 17 of 810</div> <p>1 <b>A. 2011, yes.</b></p> <p>2 <b>Q.</b> Okay. Your ownership stake, did that</p> <p>3 pay you money on top of the earnings we</p> <p>4 discussed a few moments ago?</p> <p>5 <b>A. No.</b></p> <p>6 <b>Q.</b> Okay. So when we talked about</p> <p>7 compensation, you're including whatever you</p> <p>8 owned from your ownership stake?</p> <p>9 <b>A. That is correct.</b></p> <p>10 <b>Q.</b> You started at five percent in 2011.</p> <p>11 Did that ever change?</p> <p>12 <b>A. Yes.</b></p> <p>13 <b>Q.</b> What did it change to?</p> <p>14 <b>A. There was, I forget what the schedule</b></p> <p>15 <b>was, but over a period of time it incremented</b></p> <p>16 <b>up to ten percent. So then I incremented to</b></p> <p>17 <b>ten percent. And then at some point Daryl</b></p> <p>18 <b>gifted me another 12 percent. Or another two</b></p> <p>19 <b>percent. Sorry. For a total of 12.</b></p> <p>20 <b>Q.</b> What year were you at 12 percent?</p> <p>21 <b>A. I don't recall. I don't remember when</b></p> <p>22 <b>that was.</b></p> <p>23 <b>Q.</b> Would it have been 2024?</p> <p>24 <b>A. Certainly, yeah, in '24, I was at</b></p> <p>25 <b>12 percent, yes.</b></p>	<div>19</div> <p>1 think often they mean to Heller Capital or to</p> <p>2 something, something, LLC. So we need to be</p> <p>3 precise in these answers as much as you're</p> <p>4 able.</p> <p>5 So when you say you assigned it</p> <p>6 to Daryl, you mean to Daryl Heller personally?</p> <p>7 <b>A. Yes.</b></p> <p>8 <b>Q.</b> Okay. How did that happen?</p> <p>9 <b>A. In a document that we signed. Part of</b></p> <p>10 <b>my separation agreement.</b></p> <p>11 <b>Q.</b> Okay.</p> <p>12 <b>A. Actually. Sorry. Let me back up.</b></p> <p>13 <b>We had an agreement earlier in</b></p> <p>14 <b>the year, in September/October, for me to</b></p> <p>15 <b>transfer my stock over. Daryl was going to</b></p> <p>16 <b>purchase my stock.</b></p> <p>17 <b>Q.</b> And did that occur?</p> <p>18 <b>A. And I accelerated that to the point of</b></p> <p>19 <b>completing the turnover to him when I</b></p> <p>20 <b>separated.</b></p> <p>21 <b>Q.</b> Let's start with the September/October</p> <p>22 discussion. Did that result in an agreement?</p> <p>23 <b>A. Yes.</b></p> <p>24 <b>Q.</b> Okay. Was that agreement signed?</p> <p>25 <b>A. Yes.</b></p>
<div>18</div> <p>1 <b>Q.</b> Also in 2023, also at 12?</p> <p>2 <b>A. Yes.</b></p> <p>3 <b>Q.</b> 2022?</p> <p>4 <b>A. Yes.</b></p> <p>5 <b>Q.</b> 2021?</p> <p>6 <b>A. Yes.</b></p> <p>7 <b>Q.</b> 2020?</p> <p>8 <b>A. Yes. I don't know -- before that, I</b></p> <p>9 <b>don't know.</b></p> <p>10 <b>Q.</b> Okay. So at least since 2020 you were</p> <p>11 at 12 percent?</p> <p>12 <b>A. That is correct.</b></p> <p>13 <b>Q.</b> But your ownership stake now?</p> <p>14 <b>A. Zero.</b></p> <p>15 <b>Q.</b> Okay. How did your ownership stake</p> <p>16 change?</p> <p>17 <b>A. I assigned everything to Daryl at my</b></p> <p>18 <b>termination.</b></p> <p>19 <b>Q.</b> When you say to Daryl --</p> <p>20 <b>A. To Daryl Heller.</b></p> <p>21 <b>Q.</b> I appreciate that.</p> <p>22 <b>A. Sorry.</b></p> <p>23 <b>Q.</b> And I'll just caution. A lot of the</p> <p>24 folks who I've spoken with and who sort of</p> <p>25 communicate about Daryl say, to Daryl. But I</p>	<div>20</div> <p>1 <b>Q.</b> What were the payment terms under that</p> <p>2 agreement?</p> <p>3 <b>A. I believe it was to coincide with the</b></p> <p>4 <b>payment terms of the buyout of the investors.</b></p> <p>5 <b>And then I don't remember the exact dates</b></p> <p>6 <b>after that. But it was to be concluded by</b></p> <p>7 <b>March of '25.</b></p> <p>8 <b>Q.</b> Okay. How much was the buyout?</p> <p>9 <b>A. The buyout was a total of 7.1 million.</b></p> <p>10 <b>Q.</b> And, again, we are just focusing on</p> <p>11 the September/October agreement at this point.</p> <p>12 <b>A. Understood.</b></p> <p>13 <b>Q.</b> So he agreed to purchase your</p> <p>14 12 percent stake for 7.1. And you were</p> <p>15 selling it to Daryl personally?</p> <p>16 <b>A. It may have been to Paramount, then to</b></p> <p>17 <b>Daryl. But I believe it was Daryl personally.</b></p> <p>18 <b>I don't have the document in front of me.</b></p> <p>19 <b>Certainly Daryl personally guaranteed it.</b></p> <p>20 <b>Q.</b> How many payments did you receive</p> <p>21 under the September/October agreement?</p> <p>22 <b>A. None.</b></p> <p>23 <b>Q.</b> All right. So let's move forward to,</p> <p>24 you said there was another agreement from</p> <p>25 December of 2024. What were the terms of that</p>

<div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc agreement? Certification in Support Page 18 of 810</div> <div>1 <b>A. That was my separation agreement,</b></div> <div>2 <b>which called for me to transfer all of my</b></div> <div>3 <b>stock at the point of separation as opposed to</b></div> <div>4 <b>him paying over time and getting it over time.</b></div> <div>5 <b>So if he would had made payments, he would</b></div> <div>6 <b>have gotten a percentage of stock assigned</b></div> <div>7 <b>with each payment.</b></div> <div>8 <b>Q. Okay.</b></div> <div>9 <b>A. But because that didn't happen, I</b></div> <div>10 <b>assigned everything at that point on</b></div> <div>11 <b>December 12th.</b></div> <div>12 <b>Q. What were the terms of the</b></div> <div>13 <b>December 12th agreement?</b></div> <div>14 <b>A. It was part of my separation</b></div> <div>15 <b>agreement. And that was severance. It was a</b></div> <div>16 <b>transfer of the stock. There was</b></div> <div>17 <b>reimbursement for company expenses that I had</b></div> <div>18 <b>incurred. And a transfer of the company car.</b></div> <div>19 <b>And a six-month coverage for my health</b></div> <div>20 <b>insurance. COBRA. That was my separation</b></div> <div>21 <b>agreement.</b></div> <div>22 <b>Q. Okay. So I just want to understand</b></div> <div>23 <b>this.</b></div> <div>24 <b>You had an agreement you think</b></div> <div>25</div>	<div>21 23</div> <div>1 <b>A. That's correct.</b></div> <div>2 <b>Q. Okay.</b></div> <div>3 <b>MR. VOSS: Can you mark that 2?</b></div> <div>4 <b>(Leaman Deposition Exhibit No. 2</b></div> <div>5 <b>was marked for identification.)</b></div> <div>6 <b>BY MR. VOSS:</b></div> <div>7 <b>Q. I'm handing the witness Plaintiff's 2,</b></div> <div>8 <b>Assignment of Membership Interests. This has</b></div> <div>9 <b>no Bates labels. But on the top corner it</b></div> <div>10 <b>says, MWN Draft 11/8/24.</b></div> <div>11 <b>Can you look at that?</b></div> <div>12 <b>A. Okay.</b></div> <div>13 <b>Q. All right. This agreement -- well,</b></div> <div>14 <b>first of all, have you seen this before?</b></div> <div>15 <b>A. Yes, I have.</b></div> <div>16 <b>Q. Okay. What is this?</b></div> <div>17 <b>A. This is an assignment of my stock to</b></div> <div>18 <b>Daryl.</b></div> <div>19 <b>Q. Okay. And I see at the top right</b></div> <div>20 <b>there is a draft 11/8/2024 date. But in the</b></div> <div>21 <b>preamble we actually don't have a date on</b></div> <div>22 <b>this. Again, the signature block, also no</b></div> <div>23 <b>dates.</b></div> <div>24 <b>Do you know about when this was</b></div> <div>25</div>
<div>22</div> <div>1 <b>it was from September/October to sell your</b></div> <div>2 <b>interest for 7.1?</b></div> <div>3 <b>A. Yes.</b></div> <div>4 <b>Q. And you never received payment on</b></div> <div>5 <b>that?</b></div> <div>6 <b>A. That's correct.</b></div> <div>7 <b>Q. And then there is a separate agreement</b></div> <div>8 <b>that --</b></div> <div>9 <b>A. Separation agreement.</b></div> <div>10 <b>Q. That supersedes the prior agreement?</b></div> <div>11 <b>I'm not trying to ask you a legal question.</b></div> <div>12 <b>MR. MURPHY: If you know, yeah.</b></div> <div>13 <b>THE WITNESS: Well, it did not</b></div> <div>14 <b>supersede it except for it accelerated the</b></div> <div>15 <b>conversion of the stock. So the original</b></div> <div>16 <b>agreement is in existence. It just said that,</b></div> <div>17 <b>in order for the stock to be transferred to</b></div> <div>18 <b>Daryl, I had to receive payment. On</b></div> <div>19 <b>December 12th, I said, no, I'm transferring</b></div> <div>20 <b>everything over without payment. For payment</b></div> <div>21 <b>in the future. But I expect payment in the</b></div> <div>22 <b>future.</b></div> <div>23 <b>BY MR. VOSS:</b></div> <div>24 <b>Q. So for your interest, you wanted</b></div> <div>25 <b>\$7.1 million and you have been paid none of</b></div>	<div>24</div> <div>1 <b>signed by you and Daryl?</b></div> <div>2 <b>A. I think it was on the 12th or the 13th</b></div> <div>3 <b>of December.</b></div> <div>4 <b>Q. Of December?</b></div> <div>5 <b>A. Let me look here.</b></div> <div>6 <b>MR. MURPHY: Take a second and</b></div> <div>7 <b>review the document.</b></div> <div>8 <b>THE WITNESS: Actually, this --</b></div> <div>9 <b>no. I think this was back -- this was the one</b></div> <div>10 <b>I was referring to earlier.</b></div> <div>11 <b>BY MR. VOSS:</b></div> <div>12 <b>Q. So when you talked about a September/</b></div> <div>13 <b>October agreement --</b></div> <div>14 <b>A. This is the one I was referring to</b></div> <div>15 <b>here.</b></div> <div>16 <b>Q. And if you just --</b></div> <div>17 <b>A. Yep.</b></div> <div>18 <b>Q. You just got to let me finish.</b></div> <div>19 <b>When you say this one, you're</b></div> <div>20 <b>referring to Plaintiff's 2, what's in front of</b></div> <div>21 <b>you?</b></div> <div>22 <b>A. Yes.</b></div> <div>23 <b>Q. So every answer you just gave about</b></div> <div>24 <b>the September/October agreement is the</b></div> <div>25 <b>agreement you have in front of you?</b></div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 19 of 810</div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> <div> <p><b>A. That's correct.</b></p> <p><b>Q.</b> Okay. The second paragraph talks about an assignment and three payment dates. Do you see that?</p> <p><b>A. Yes.</b></p> <p><b>Q.</b> Were any of those payments made?</p> <p><b>A. No.</b></p> <p>MR. VOSS: We'll mark this one 3.</p> <p>(Leaman Deposition Exhibit No. 3 was marked for identification.)</p> <p>BY MR. VOSS:</p> <p><b>Q.</b> I'm handing the witness what's been marked Leaman 3. The last one was Leaman 2. I'm calling them plaintiff's. But we're using Leaman numbers for this.</p> <p>Again, unBates labeled. This one happens to be dated in the preamble, The Amendment to Assignment of Membership Interests dated December 12th, 2024.</p> <p>Mr. Leaman, have you seen that document before?</p> <p><b>A. Yes.</b></p> <p><b>Q.</b> Okay. What can you tell me about this agreement?</p> </div> </div>	<div> <div>25</div> <div>26</div> <div>27</div> <div>28</div> <div>29</div> <div>30</div> <div>31</div> <div>32</div> <div>33</div> <div>34</div> <div>35</div> <div>36</div> <div>37</div> <div>38</div> <div>39</div> <div>40</div> <div>41</div> <div>42</div> <div>43</div> <div>44</div> <div>45</div> <div>46</div> <div>47</div> <div>48</div> <div>49</div> <div>50</div> </div> <div> <p>here, this is 4 and 5.</p> <p>(Leaman Deposition Exhibit Nos. 4 and 5 were marked for identification.)</p> <p>BY MR. VOSS:</p> <p><b>Q.</b> Mr. Leaman, I'm handing you two documents marked Leaman 4 and 5.</p> <p>The first is an Assignment of Membership Interests. Also dated December 12th.</p> <p>And the preamble of this one concerns you and PowerCoin.</p> <p>And the second one is marked Exhibit 5. And it's captioned, Repayment Agreement.</p> <p>First of all, have you seen those before?</p> <p>MR. MURPHY: Take your time to look at them.</p> <p>THE WITNESS: Yes, I saw that one.</p> <p>BY MR. VOSS:</p> <p><b>Q.</b> And that one refers to 4?</p> <p><b>A. Yes, No. 4. Yes.</b></p> <p><b>Q.</b> Actually, just as a matter of housekeeping. 2, 3, 4 and 5 all have a</p> </div>
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<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 20 of 810</div> <div>percentage?</div> <div> <div>A. Well, it's 12 percent. I was thinking it was either 10 or 12. It was 12.</div> <div>Q. When did you get that interest?</div> <div>A. Whenever PowerCoin was formed.</div> <div>Q. Okay. Did you pay for that interest?</div> <div>A. No.</div> <div>Q. Same question regarding your stake in Paramount. Did you pay for any of your interest in Paramount, five, 10, 12 percent?</div> <div>A. No.</div> <div>Q. Okay. Were you paid, and as I understand these, and you'll correct me if my understanding is wrong. I believe 4 and 5 go together. Indeed, if you look at Paragraph 15 of No. 4 contemplates a repayment agreement. It references it. And then there is an exhibit page, Exhibit 1. And then I believe Exhibit 5 is the referenced exhibit.</div> <div>Let's start with that. Is Exhibit 5 the exhibit that's referenced in Exhibit 4?</div> <div>A. I believe so. But I am not a hundred percent sure.</div> <div>Q. Okay. Well, did you receive these two</div> </div> </div>	<div> <div>29</div> <div>31</div> <div>over the years and had their corporations continuing.</div> <div>Q. Okay. And referring to Exhibit 2 and Exhibit 3, you were also -- was it your understanding you were conveying an interest in First Regents and PowerQuest in addition to your interest in Paramount Management Group?</div> <div>A. Yes.</div> <div>Q. What was your stake in First Regents?</div> <div>A. It would have been the same.</div> <div>Q. 12 percent?</div> <div>A. Yes.</div> <div>Q. What about your stake in PowerQuest?</div> <div>A. It would have been the same. 12 percent.</div> <div>Q. 12 percent?</div> <div>A. Um-hmm.</div> <div>Q. And duplicate pay for either of those interests?</div> <div>A. No.</div> <div>Q. And we can see in Exhibit 3, I hate to toggle between them, but Paragraph 1 identifies an amendment to Paragraph 2. Where PowerQuest was misspelled and now it's corrected in Exhibit 3.</div> </div>
<div> <div>30</div> <div>documents before I gave them to you just now?</div> <div>A. I received -- yes, I did.</div> <div>Q. Okay. What is your understanding of what you will be paid under Exhibit 4 and Exhibit 5?</div> <div>A. At some point in the future, the way I understood this, was when -- if or when PowerCoin was sold, that I would get my share, whatever the 12 percent share of whatever the net proceeds were. That was my understanding.</div> <div>Q. Okay. Have you been paid any money under either of these agreements?</div> <div>A. No.</div> <div>Q. And these, again, I'm referring to 4 and 5?</div> <div>A. No.</div> <div>Q. No money.</div> <div>Are there any other entities that you had an interest in within the Heller universe of entities?</div> <div>A. Yes. There was a couple of other entities for companies we had acquired. I think one of them was PowerQuest. So there was PowerQuest, PowerCoin, Paramount, First Regents. So various entities we had acquired</div> </div>	<div> <div>32</div> <div>Do you see that?</div> <div>A. I do.</div> <div>Q. And is your understanding that the entity that you had an interest in is the one described in Exhibit 3, Paragraph 1?</div> <div>A. Yes. There was only one PowerQuest.</div> <div>Q. Very good.</div> <div>MR. VOSS: 6.</div> <div>(Leaman Deposition Exhibit No. 6 was marked for identification.)</div> <div>BY MR. VOSS:</div> <div>Q. I'm handing the witness a document marked Leaman 6. It's titled, Separation Agreement. It's dated December 12th, in the preamble.</div> <div>Have a look at that, if you would, Mr. Leaman?</div> <div>A. Okay.</div> <div>Q. First of all, have you seen this document before?</div> <div>A. Yes, I have.</div> <div>Q. What is it?</div> <div>A. It's my separation agreement from Paramount and all entities.</div> <div>Q. And if I could ask you to flip to page</div> </div>



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<div> <div>34</div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> </div>	<div> <div>36</div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> </div>

**A. There would be, yes.**

**Q.** And did you search through those files in your gmail inbox in response to the subpoena?

**A. I did.**

**Q.** So other than the car and the

computer, any other physical assets you received upon your separation?

**A. No.**

**Q.** And your last day at Paramount was December 12th, 2024?

**A. Yes.**

**Q.** All right. Actually, I should have said this at the start. If you want a break, give me the high sign and we'll take a break for any reason.

**A. Okay.**

**Q.** But I'd like to keep going if at all possible.

**A. I'm fine.**

**Q.** Okay. Very good.

So let's talk about Paramount generally. What was Paramount's business? What did it do?

What did it do?

**A. Paramount would install ATMs and manage them. Made sure they stayed up and running.**

**Q.** When you say install, what does that mean?

**A. That means we would either, we would acquire ATMs and we would find locations to place the ATMs in a retail site. And we would bolt it to the floor and get cash put into it and plug it into the wall and bring it live and connect it to all of the networks that we operated with.**

**Q.** The ATMs that Paramount managed, were they all purchased and installed or were some in place?

**A. Some were in place as a result of acquisitions that we did.**

**Q.** Do you have a sense of how many acquisitions Paramount did in your tenure there?

**A. A sense but it's an estimate.**

**Q.** I'll take an estimate.

**A. Okay. I'm going to say around 35**

**companies acquired.**

**Q. Who were the officers of Paramount?**

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 23 of 810</div> <div> <div>41</div> <div>Let's just do, say the last three years to the</div> <div>Certification in Support</div> </div> </div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> <div> <p>extent they changed. But officers each year for 2024, 2023 and 2022?</p> <p><b>A. That would be, stay the same. It would have been me, Dennis Ream and Steve Gernes.</b></p> <p><b>Q.</b> And I think you might have said it already. But let's, your title for those three years was CEO?</p> <p><b>A. Effective 2022. Steve Gernes started in 2022. And when he started, he became president. I moved from president to CEO.</b></p> <p><b>Q.</b> I see. And Ream was --</p> <p><b>A. CFO.</b></p> <p><b>Q.</b> CFO. Got it.</p> <p>Was Daryl an officer of the company?</p> <p><b>A. I don't think so. I don't know.</b></p> <p><b>Q.</b> And to be clear. When I say Daryl, I'm referring to Daryl Heller. You understand that?</p> <p><b>A. Yes.</b></p> <p><b>Q.</b> I shall do my best to say Mr. Heller.</p> <p><b>A. I understand.</b></p> <p><b>Q.</b> Daryl was not an officer, to your</p> </div>	<div> <div>43</div> <div>Page 23 of 810</div> </div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> <div> <p><b>A. I don't think he was paid anything.</b></p> <p><b>Q.</b> How was the transfer done? Was it by agreement? Was it oral?</p> <p><b>A. By agreement.</b></p> <p><b>Q.</b> Written agreement?</p> <p><b>A. Yes.</b></p> <p><b>Q.</b> Do you know when, approximately, that written agreement was executed?</p> <p><b>A. I'm really bad with dates. I'm going to say September/October '24. Sometime in that timeframe.</b></p> <p><b>Q.</b> Do you know when Dennis Ream left Paramount?</p> <p><b>A. What do you mean by left? I'm not sure. You mean like was terminated or his employment ended?</b></p> <p><b>Q.</b> Whenever his last day of employment was?</p> <p><b>A. I don't remember when. But it was sometime in I believe September/October.</b></p> <p><b>Q.</b> What did Daryl do on -- let's start with a day-to-day basis at Paramount?</p> <p><b>A. On a day-to-day basis, Daryl was not involved from an operational standpoint.</b></p> <p><b>Q.</b> Okay. Did he have a role outside of</p> </div>
<div> <div>42</div> </div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> <div> <p>understanding?</p> <p><b>A. That is correct.</b></p> <p><b>Q.</b> What was his role in Paramount?</p> <p><b>A. He was the majority owner of Paramount.</b></p> <p><b>Q.</b> What stake was that?</p> <p><b>A. So Dennis was five. I was 12. What's that, 73? No. 83 percent.</b></p> <p><b>Q.</b> Was that Daryl Heller personally or an entity?</p> <p><b>A. I believe that was an entity. I believe it was Heller Capital. But I'm not a hundred percent sure.</b></p> <p><b>Q.</b> Okay. And as I said, I've come to understand people just refer to Daryl owning things or Daryl receiving things. But as much as we can be precise, you and I both --</p> <p><b>A. I cannot say that for certain.</b></p> <p><b>Q.</b> Okay. You said Dennis Ream owned five percent interest in Paramount, is that right?</p> <p><b>A. That is correct.</b></p> <p><b>Q.</b> Do you know if he sold his interest?</p> <p><b>A. I believe he transferred it to Daryl as well upon his termination.</b></p> <p><b>Q.</b> Do you know what he was paid for that?</p> </div>	<div> <div>44</div> </div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> <div> <p>operations?</p> <p><b>A. He managed the funding that would come to Paramount in conjunction with Dennis Ream.</b></p> <p><b>Q.</b> So I asked you on a day-to-day basis. Let's try month to month or year to year. A little more global. What did he do at Paramount?</p> <p><b>A. At Paramount, I met with him to talk about any operational issues on a very rare basis. We would on an occasional basis, every other month so, have a financial review. And he provided the capital and direction around how it should be used.</b></p> <p><b>Q.</b> Fair to say he was intimately involved in the finances of Paramount?</p> <p><b>A. Yes.</b></p> <p><b>Q.</b> Did he control money in and out of the company?</p> <p><b>A. Yes.</b></p> <p><b>Q.</b> Did he direct you to transfer monies in and out of the company?</p> <p><b>A. I really didn't get involved in that. A little bit toward the end as we were -- as, you know, after Dennis had left and I was working with Brandon. I was taking Daryl's</b></p> </div>

<div>45</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Instructions and handing them to Brandon Certification in Support Page 24 of 810</div> <div>1 Q. Okay. Did he use Paramount funds for</div> <div>2 other entities that he owned?</div> <div>3</div> <div>4 <b>A. Not to my knowledge.</b></div> <div>5 Q. So, for example, did he take money out</div> <div>6 of Paramount and spend it on cannabis?</div> <div>7 <b>A. I don't know.</b></div> <div>8 Q. Who would know that?</div> <div>9 <b>A. I believe Dennis would know that.</b></div> <div>10 Q. Did Paramount loan money to any</div> <div>11 entities?</div> <div>12 <b>A. I don't know.</b></div> <div>13 Q. Who would know that?</div> <div>14 <b>A. Dennis and Daryl.</b></div> <div>15 Q. Did he use Paramount's money for his</div> <div>16 own purposes?</div> <div>17 <b>A. I don't know.</b></div> <div>18 Q. Who would know that?</div> <div>19 <b>A. I think Dennis and Daryl would know</b></div> <div>20 <b>that.</b></div> <div>21 Q. So only Dennis and Daryl know about</div> <div>22 the finances of Paramount from your time</div> <div>23 there?</div> <div>24 <b>A. I knew the finances as it related to</b></div> <div>25 <b>the operating of the business. So revenue,</b></div>	<div>47</div> <div>the operating expenses of Paramount, yes.</div> <div>1 Q. When you say operating expenses, what</div> <div>2 do you mean?</div> <div>3</div> <div>4 <b>A. So payroll, paying the vendors, cash,</b></div> <div>5 <b>maintenance. So from an operating standpoint.</b></div> <div>6 <b>I don't know what the liabilities were. But</b></div> <div>7 <b>from an operating standpoint, it generated</b></div> <div>8 <b>positive operating cash until, well, until the</b></div> <div>9 <b>end.</b></div> <div>10 Q. When you say vendors, do you mean</div> <div>11 Prestige Investment Group or any of the</div> <div>12 plaintiff funds that I remember?</div> <div>13 <b>A. No. I mean trade vendors.</b></div> <div>14 Q. Trade vendors.</div> <div>15 Did you know how much money</div> <div>16 Paramount owed to the funds?</div> <div>17 <b>A. No.</b></div> <div>18 Q. Do you know what a management services</div> <div>19 agreement is?</div> <div>20 <b>A. Yes.</b></div> <div>21 Q. Did you see any of the management</div> <div>22 service agreements between Paramount and any</div> <div>23 of the plaintiff funds in this case?</div> <div>24 <b>A. I did, yes. And I believe I signed a</b></div> <div>25 <b>couple of them.</b></div>
<div>46</div> <div>1 <b>cost of goods sold, SGA expenses, that's what</b></div> <div>2 <b>we reviewed with him on a monthly basis. In</b></div> <div>3 <b>terms of a balance sheet and cash in and out,</b></div> <div>4 <b>that was between him and Dennis.</b></div> <div>5 Q. And up had no line of sight on that?</div> <div>6 <b>A. No.</b></div> <div>7 Q. You didn't look at balance sheets?</div> <div>8 <b>A. No.</b></div> <div>9 Q. General ledgers?</div> <div>10 <b>A. No.</b></div> <div>11 Q. Profit and loss statements?</div> <div>12 <b>A. Profit and loss statement.</b></div> <div>13 Q. Okay. How did Paramount make money?</div> <div>14 <b>A. Paramount made money by transaction</b></div> <div>15 <b>fees from ATMs that came off of the revenue</b></div> <div>16 <b>that came off the ATMs.</b></div> <div>17 Q. What else?</div> <div>18 <b>A. We sold some services like maintenance</b></div> <div>19 <b>services. We would lease cash from our cash</b></div> <div>20 <b>provider. But primarily it was transaction</b></div> <div>21 <b>fees off of ATMs.</b></div> <div>22 Q. Was that revenue alone sufficient to</div> <div>23 cover Paramount's liabilities?</div> <div>24 <b>A. I don't know what Paramount's</b></div> <div>25 <b>liabilities were but it was enough to cover</b></div>	<div>48</div> <div>1 Q. Okay. And under those agreements, you</div> <div>2 would agree there was a monthly revenue</div> <div>3 agreement?</div> <div>4 <b>A. Yes.</b></div> <div>5 Q. So were you familiar with how much</div> <div>6 money was owed each month to each fund?</div> <div>7 <b>A. I became aware of it -- no. So the</b></div> <div>8 <b>answer is I became aware of where it was in</b></div> <div>9 <b>the spring of 2024. And various points along</b></div> <div>10 <b>the way there would be, I think I even</b></div> <div>11 <b>submitted this as a document, where there was,</b></div> <div>12 <b>you know, Dennis would say, hey, this is what</b></div> <div>13 <b>our monthly payments are. But generally we</b></div> <div>14 <b>did not review that.</b></div> <div>15 Q. Okay. Let's back up a little bit.</div> <div>16 So did you see the money coming</div> <div>17 in from the Funds into Paramount?</div> <div>18 <b>A. No.</b></div> <div>19 Q. Did you see the money going out of</div> <div>20 Paramount to the Funds?</div> <div>21 <b>A. No.</b></div> <div>22 Q. Who saw these things?</div> <div>23 <b>A. Dennis Ream.</b></div> <div>24 Q. Dennis Ream alone?</div> <div>25 <b>A. I'm assuming. It may even be that or</b></div>



<div> <div>53</div> <div> <div>Case 25-11354 JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 26 of 810</div> <div> <p>1 Q. Okay. What's the most ATMs that</p> <p>2 Paramount ever had online at any point in</p> <p>3 time?</p> <p>4 <b>A. An estimate is fair?</b></p> <p>5 <b>Q. Estimate is fair.</b></p> <p>6 <b>A. Yeah. Around 20,000.</b></p> <p>7 <b>Q. Around 20,000. If I told you it was</b></p> <p>8 <b>closer to 17,000, would you agree with that?</b></p> <p>9 <b>A. Yes, except that we would occasionally</b></p> <p>10 <b>have, and actually in a lot of cases had</b></p> <p>11 <b>seasonal ATMs that would come online. So it</b></p> <p>12 <b>could go up. I remember seeing numbers up to</b></p> <p>13 <b>20,000, 19,500 or something.</b></p> <p>14 <b>Q. Okay. Where were those numbers</b></p> <p>15 <b>communicated to you? How were they</b></p> <p>16 <b>communicated to you?</b></p> <p>17 <b>A. They were communicated on the monthly</b></p> <p>18 <b>packet of information.</b></p> <p>19 <b>Q. Is that monthly packet called --</b></p> <p>20 <b>A. Financial information, yes.</b></p> <p>21 <b>Q. Is that monthly packet called the</b></p> <p>22 <b>gross profit report?</b></p> <p>23 <b>A. No. It was communicated on our P&amp;L</b></p> <p>24 <b>that we had a monthly deck that we put</b></p> <p>25 <b>together and they would put the numbers at the</b></p> </div> </div> </div>	<div> <div>55</div> <div> <div>25 Entered 04/25/25 14:39:18 Desc Page 26 of 810</div> <div> <p>2 <b>Q. If I told you that it was, would you</b></p> <p>3 <b>agree with that or disagree with that?</b></p> <p>4 <b>A. I would agree with that. I don't know</b></p> <p>5 <b>that it was actually showing a number. But</b></p> <p>6 <b>all the ATMs were on the list. So I don't</b></p> <p>7 <b>know the exact -- I don't think there was a</b></p> <p>8 <b>count shown. I'm just saying they were on</b></p> <p>9 <b>that list. I'm sure you could find it from</b></p> <p>10 <b>that report.</b></p> <p>11 <b>Q. Right. And the number of ATMs on the</b></p> <p>12 <b>gross profit report would have been accurate?</b></p> <p>13 <b>A. Yes.</b></p> <p>14 <b>Q. Something the company would have</b></p> <p>15 <b>relied on to plan its business?</b></p> <p>16 <b>A. Yes.</b></p> <p>17 <b>Q. Okay. So to date I have been asking</b></p> <p>18 <b>you about ATMs online. What's the most ATMs</b></p> <p>19 <b>you had anywhere in total, online, sitting in</b></p> <p>20 <b>a warehouse, sitting in the office, you name</b></p> <p>21 <b>it, most ATMs at any point in time?</b></p> <p>22 <b>A. I don't know. 23, 24,000.</b></p> <p>23 <b>Q. What do you base that on?</b></p> <p>24 <b>A. The ones that I knew that we had in</b></p> <p>25 <b>the warehouse plus the ones that were active</b></p> </div> </div> </div>
<div> <div>54</div> <div> <p>1 <b>top of each month and how many were active.</b></p> <p>2 <b>Q. Did the numbers on the P&amp;L accurately</b></p> <p>3 <b>reflect the number of ATMs that were online?</b></p> <p>4 <b>A. I believe so.</b></p> <p>5 <b>Q. Did you see a document called the</b></p> <p>6 <b>Gross Profit Report?</b></p> <p>7 <b>A. Yes.</b></p> <p>8 <b>Q. Can you describe that for me?</b></p> <p>9 <b>A. The Gross Profit Report was a listing</b></p> <p>10 <b>of every portfolio. And whether it was an</b></p> <p>11 <b>acquired portfolio or a grouping by state of</b></p> <p>12 <b>ATMs, the revenue that was generated and the</b></p> <p>13 <b>direct costs that were part of that and the</b></p> <p>14 <b>gross profit margin that was generated as a</b></p> <p>15 <b>result of those.</b></p> <p>16 <b>Q. How often was it generated?</b></p> <p>17 <b>A. Monthly.</b></p> <p>18 <b>Q. And did that include every ATM within</b></p> <p>19 <b>the Paramount universe of ATMs?</b></p> <p>20 <b>A. Yes.</b></p> <p>21 <b>Q. I apologize if I just asked this. But</b></p> <p>22 <b>were the number of active ATMs reflected on</b></p> <p>23 <b>the gross profit report?</b></p> <p>24 <b>A. I don't believe so. I never saw it</b></p> <p>25 <b>there.</b></p> </div> </div>	<div> <div>56</div> <div> <p>1 <b>Q. When would that number have gotten to</b></p> <p>2 <b>around 23 to 24,000?</b></p> <p>3 <b>A. You mean like when did it hit that</b></p> <p>4 <b>peak?</b></p> <p>5 <b>Q. Yes.</b></p> <p>6 <b>A. I think it was that way in '24.</b></p> <p>7 <b>Q. Okay. What warehouses had ATMs in</b></p> <p>8 <b>them?</b></p> <p>9 <b>A. There was one in Lancaster near</b></p> <p>10 <b>Greenfield. It was called Way Services.</b></p> <p>11 <b>Q. Is that what's commonly referred to as</b></p> <p>12 <b>the Pitney Road warehouse?</b></p> <p>13 <b>A. It is, yes.</b></p> <p>14 <b>Q. I've been there.</b></p> <p>15 <b>A. Okay.</b></p> <p>16 <b>Q. What other warehouses?</b></p> <p>17 <b>A. I believe we had ATMs at the various</b></p> <p>18 <b>regional locations where we had employees and</b></p> <p>19 <b>where we did business. So I think we had some</b></p> <p>20 <b>in New York, some in Mississippi, I believe.</b></p> <p>21 <b>Some in Tennessee, Nashville, Tennessee. And</b></p> <p>22 <b>I think we had some in Florida. And maybe</b></p> <p>23 <b>some in -- no, I don't know. I don't know for</b></p> <p>24 <b>sure. I know we would keep just a handful in</b></p> <p>25 <b>various locations so when we needed to deploy</b></p> </div> </div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Certification in Support of the gross profit margin report by backing out the gross profit margin report by backing out</div> <div>57</div> <div>1 machines, we had machines to do that. I don't</div> <div>2 know the exact location of those warehouses.</div> <div>3 Q. Apart from the Lancaster warehouse,</div> <div>4 let's focus on these regional warehouses. In</div> <div>5 your estimate, were there dozens there,</div> <div>6 hundreds there, thousands there at each one?</div> <div>7 A. At the regional ones now?</div> <div>8 Q. Yes.</div> <div>9 A. I would say less than a dozen. Or a</div> <div>10 dozen, let's say.</div> <div>11 Q. Okay. Did Paramount ever have more</div> <div>12 than 30,000 ATMs anywhere in the world,</div> <div>13 online, in the warehouses, in your office,</div> <div>14 anywhere, at any point in time?</div> <div>15 A. Not to my knowledge. But I did</div> <div>16 discover that there were, as part of the</div> <div>17 process that was occurring, that there were</div> <div>18 warehouses where Daryl had bought machines and</div> <div>19 had ATMs. But I was not aware of those. I</div> <div>20 was aware of one of them. I think it was</div> <div>21 about a thousand units.</div> <div>22 Q. Okay. We'll get into that in a</div> <div>23 minute.</div> <div>24 In 2023, any idea how many ATMs</div> <div>25 were online?</div> </div>	<div> <div>59</div> <div>1 some of the -- you have to back out Cyprus.</div> <div>2 And then within some of the portfolios, there</div> <div>3 is a handful of, you know, a couple thousand</div> <div>4 other locations. So you could probably get to</div> <div>5 it with somebody with some degree of</div> <div>6 knowledge. And I don't have that,</div> <div>7 unfortunately.</div> <div>8 Q. Would Leigh Danca have known that?</div> <div>9 A. She would have been able to figure</div> <div>10 that out.</div> <div>11 Q. You said you'd have to back out</div> <div>12 Cyprus. Why would you have to back out</div> <div>13 Cyprus?</div> <div>14 A. Because those were processing only</div> <div>15 locations. They were not company-owned</div> <div>16 locations.</div> <div>17 Q. And just describe that for me. What</div> <div>18 does that mean?</div> <div>19 A. That means the hardware in those ATM</div> <div>20 locations were not owned by Paramount or</div> <div>21 affiliates.</div> <div>22 Q. You would agree those were not capable</div> <div>23 of being sold by Paramount to others, the</div> <div>24 actual physical ATMs?</div> <div>25</div> </div>
<div> <div>58</div> <div>1 A. No. Because I think we had a couple</div> <div>2 acquisitions and they -- I don't know what</div> <div>3 they were at various points along the way.</div> <div>4 Q. All right. Then I won't go back in</div> <div>5 time.</div> <div>6 What's the most that Paramount</div> <div>7 ever owned at any time?</div> <div>8 A. I don't know the answer to that.</div> <div>9 Q. Can you give me an estimate?</div> <div>10 A. You mean when you say owned, do you</div> <div>11 mean actually owned the ATM that it was</div> <div>12 operating at?</div> <div>13 Q. Yes.</div> <div>14 A. In addition to the ones in the</div> <div>15 warehouse, I'm going to say we had probably, I</div> <div>16 don't know, 10,000 plus whatever was in the</div> <div>17 warehouse. That's a complete estimate. I</div> <div>18 don't know.</div> <div>19 Q. Who would know the answer to that?</div> <div>20 A. I believe Dennis would be able to get</div> <div>21 the information. It would be at Paramount in</div> <div>22 a report somewhere.</div> <div>23 Q. What report would have that</div> <div>24 information?</div> <div>25 A. I think he could probably get it off</div> </div>	<div> <div>60</div> <div>1 A. The actual hardware? Yes, I would</div> <div>2 agree with that.</div> <div>3 Q. Okay.</div> <div>4 A. But you're able -- well, let me stop.</div> <div>5 Q. Finish your answer.</div> <div>6 A. No. That's my answer.</div> <div>7 Q. Well, what are you able to do with the</div> <div>8 Cyprus-managed ATMs?</div> <div>9 A. You're able to generate revenue off of</div> <div>10 it. You're able to sell that recurring</div> <div>11 revenue.</div> <div>12 Q. Understood. Just one further</div> <div>13 follow-up question on the gross profit report.</div> <div>14 And I do have a reasonable stopping point in a</div> <div>15 minute, counsel.</div> <div>16 The gross profit reflected on</div> <div>17 that report, how was that generated, if you</div> <div>18 recall? When it says, gross profit, what is</div> <div>19 that report reflecting?</div> <div>20 A. Yeah. As I said before, it's</div> <div>21 reflecting the revenue coming off the machines</div> <div>22 minus the expenses associated with operating</div> <div>23 those machines. So the cost of goods sold.</div> <div>24 Q. Okay. So that's more of a net number,</div> <div>25 then, than a gross?</div> </div>

<div> <div>61</div> <div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc</div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> </div> </div>	<div> <div>63</div> <div> <div>Page 28 of 810</div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> </div> </div>
<div> <div>62</div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> </div>	<div> <div>64</div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> </div>



<div>65</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 29 of 810</div> <div> <p>1 <b>A. I'm going to say September 24</b></p> <p>2 <b>October.</b></p> <p>3 <b>Q.</b> How much was it?</p> <p>4 <b>A. I don't remember.</b></p> <p>5 <b>Q.</b> Can you estimate?</p> <p>6 <b>A. I can't. I don't even remember the</b></p> <p>7 <b>amount. It was not significant. But I don't</b></p> <p>8 <b>remember the amount.</b></p> <p>9 <b>Q.</b> Did you approve that?</p> <p>10 <b>A. Daryl approved it. Daryl asked --</b></p> <p>11 <b>required, asked for it from either Dennis or</b></p> <p>12 <b>Brandon. It was in a text message, I believe.</b></p> <p>13 <b>Q.</b> I see.</p> <p>14 And he was not an officer of the</p> <p>15 company at that time?</p> <p>16 <b>A. Correct.</b></p> <p>17 <b>Q.</b> And he had authority to remove</p> <p>18 operating revenue to pay expenses for</p> <p>19 unrelated businesses?</p> <p>20 <b>A. He was the owner of the company and</b></p> <p>21 <b>that's what he directed.</b></p> <p>22 <b>Q.</b> Did Paramount fail as a business?</p> <p>23 <b>A. Ultimately, yes.</b></p> <p>24 <b>Q.</b> Why did it fail?</p> <p>25 <b>A. Because the -- I think because the</b></p> </div>	<div>67</div> <div></div> <div> <p>1 <b>Q.</b> Was Paramount out of operating revenue</p> <p>2 <b>by November 2024?</b></p> <p>3 <b>A. Out of --</b></p> <p>4 <b>Q.</b> Operating revenue?</p> <p>5 <b>A. What do you mean by out of operating</b></p> <p>6 <b>revenue?</b></p> <p>7 <b>Q.</b> Was it able to conduct operations?</p> <p>8 <b>A. By November 2024? It was operating</b></p> <p>9 <b>through Thanksgiving.</b></p> <p>10 <b>Q.</b> Okay.</p> <p>11 <b>A. Because at Thanksgiving, that's when</b></p> <p>12 <b>we got the notice that Cash Connect was</b></p> <p>13 <b>removing all of the cash.</b></p> <p>14 <b>Q.</b> Let's try it this way.</p> <p>15 When, in your view, was</p> <p>16 Paramount insolvent, month and year?</p> <p>17 <b>A. I don't know. I don't know how to</b></p> <p>18 <b>determine insolvency.</b></p> <p>19 <b>Q.</b> So, for example, in September of 2024,</p> <p>20 it wasn't your position that the company was</p> <p>21 insolvent?</p> <p>22 <b>A. I don't -- I'm not an accountant. I</b></p> <p>23 <b>don't know what insolvency is. But I will</b></p> <p>24 <b>tell you that we lost very little business at</b></p> <p>25</p> </div>
<div>66</div> <div></div> <div> <p>1 <b>cash, the operating cash, was pulled out of</b></p> <p>2 <b>the business. It could no longer operate</b></p> <p>3 <b>effectively. And when the \$138 million</b></p> <p>4 <b>judgment went into place, the bank, from the</b></p> <p>5 <b>investors, the primary bank removed all the</b></p> <p>6 <b>cash.</b></p> <p>7 <b>Q.</b> Well, let's start with this. You said</p> <p>8 there were some loan payments being made to</p> <p>9 Square and --</p> <p>10 <b>A. Dash. Dash Funding or something,</b></p> <p>11 <b>yeah.</b></p> <p>12 <b>Q.</b> Why were those loans taken out?</p> <p>13 <b>A. I don't know.</b></p> <p>14 <b>Q.</b> Was it to facilitate operating revenue</p> <p>15 for the company?</p> <p>16 <b>A. I don't know. Daryl signed up for</b></p> <p>17 <b>those. I discovered a number of debt loans</b></p> <p>18 <b>that Daryl made that at least I was not aware</b></p> <p>19 <b>of.</b></p> <p>20 <b>Q.</b> How many?</p> <p>21 <b>A. I don't know.</b></p> <p>22 <b>Q.</b> More than ten?</p> <p>23 <b>A. I don't know.</b></p> <p>24 <b>Q.</b> Dollar amount, estimate?</p> <p>25 <b>A. I have no idea. I only read about it</b></p> </div>	<div>68</div> <div></div> <div> <p>1 <b>that time.</b></p> <p>2 <b>Q.</b> Okay.</p> <p>3 <b>A. And it continued to operate as normal</b></p> <p>4 <b>in terms of we still had revenues come in and</b></p> <p>5 <b>we still had the vendor payments and things</b></p> <p>6 <b>that were going that were -- the company was</b></p> <p>7 <b>still operating as an operating entity at that</b></p> <p>8 <b>point.</b></p> <p>9 <b>Q.</b> I'm going to pause here and give you a</p> <p>10 chance.</p> <p>11 You understand your counsel has</p> <p>12 given me all your text messages?</p> <p>13 <b>A. Yep.</b></p> <p>14 <b>Q.</b> My question is -- we'll take a break.</p> <p>15 When, in your opinion, was the</p> <p>16 company insolvent? And I'll ask that question</p> <p>17 first thing when we get back from our break.</p> <p>18 <b>A. That's fine.</b></p> <p>19 (A brief recess was taken.)</p> <p>20 MR. VOSS: Court reporter, can</p> <p>21 you read back the standing question from our</p> <p>22 break, from just before the break?</p> <p>23 (The question referred to was</p> <p>24 read back by the reporter.)</p> <p>25 THE WITNESS: The answer is, I</p> </div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 30 of 810</div> <div> <div>69</div> <div> <div>1 do not know the definition of insolvency. But</div> <div>2 what I will say is that Paramount was unable</div> <div>3 to pay its vendors and customers on time</div> <div>4 starting in August, July, August. August of</div> <div>5 '24, I believe.</div> <div>6 BY MR. VOSS:</div> <div>7 Q. August of 2024?</div> <div>8 A. I believe.</div> <div>9 Q. Do you think Paramount was a Ponzi</div> <div>10 scheme?</div> <div>11 A. I do not know.</div> <div>12 Q. Who would have been in the accounting</div> <div>13 department in 2024? Just as many names as you</div> <div>14 can remember. If it's legion, maybe just the</div> <div>15 top folks.</div> <div>16 A. Yes. It would have been a Dennis</div> <div>17 Ream, Brandon Hall, Liz -- Elizabeth -- I</div> <div>18 forget her last name. Those were the leaders.</div> <div>19 She was the controller. That was the</div> <div>20 management.</div> <div>21 Q. I'm sorry. Did you say Liz' last</div> <div>22 name?</div> <div>23 A. I did not. I'm sorry.</div> <div>24 Q. Full name Elizabeth?</div> <div>25 A. Elizabeth, yeah. I forget her last</div> </div> </div> </div>	<div> <div>71</div> <div> <div>1 think if there was anybody else. I don't</div> <div>2 think there was anybody else. I don't recall</div> <div>3 anybody else.</div> <div>4 Q. Jorge Fernandez?</div> <div>5 A. No.</div> <div>6 Q. So just Gernes and Fuentes?</div> <div>7 A. Yes. I believe so. Something sticks</div> <div>8 in my mind there might have been one more.</div> <div>9 But I can't remember.</div> <div>10 Q. Any reason to believe Mr. Gernes or</div> <div>11 Ms. Fuentes were paid at any point in 2025</div> <div>12 under their severance agreements?</div> <div>13 A. I have no knowledge of that.</div> <div>14 Q. What banks did Paramount use?</div> <div>15 A. I believe FNB. I know there was</div> <div>16 another one. JBT, I think.</div> <div>17 Q. Is that Jonestown Bank?</div> <div>18 A. I think so, yeah.</div> <div>19 Q. Did Paramount have any brokerage</div> <div>20 accounts?</div> <div>21 A. Not to my knowledge.</div> <div>22 Q. Did it own any stocks?</div> <div>23 A. I don't know.</div> <div>24 Q. Did it own any bonds?</div> <div>25 A. I don't know.</div> </div> </div>
<div> <div>70</div> <div> <div>1 name.</div> <div>2 Q. Okay.</div> <div>3 A. I'm bad with names.</div> <div>4 Q. And, sorry, I missed a note.</div> <div>5 If you had been called to</div> <div>6 testify in September 2024 that the company was</div> <div>7 solvent, would you have been able to say it is</div> <div>8 solvent as of September of 2024?</div> <div>9 A. No.</div> <div>10 Q. Switching back to employees. You have</div> <div>11 a severance agreement. I heard that Dennis</div> <div>12 Ream had a severance agreement. Did anybody</div> <div>13 else get a severance agreement?</div> <div>14 A. As of that time, you mean?</div> <div>15 Q. Yes. Fair distinction.</div> <div>16 As of December, was anybody</div> <div>17 else, did they receive or were they already</div> <div>18 under a severance agreement?</div> <div>19 A. I'm sorry. December of '24?</div> <div>20 Q. 2024. If I said '25, I meant '24.</div> <div>21 A. No, you did say '24. I just wanted to</div> <div>22 make sure what I was thinking.</div> <div>23 There were, I believe Steve</div> <div>24 Gernes had a severance agreement. Mya Fuentes</div> <div>25 had a severance agreement. I'm trying to</div> </div> </div>	<div> <div>72</div> <div> <div>1 Q. Any other investments?</div> <div>2 A. Not to my knowledge.</div> <div>3 Q. Who would know the answers to those</div> <div>4 questions?</div> <div>5 A. Dennis Ream would.</div> <div>6 Q. Did the company have safe deposit</div> <div>7 boxes anywhere?</div> <div>8 A. Not to my knowledge.</div> <div>9 Q. Did it have any safes?</div> <div>10 A. Not to my knowledge.</div> <div>11 Q. Let's talk about company cars. As of</div> <div>12 December 2024. I want to say December 1st, to</div> <div>13 avoid any title transfers.</div> <div>14 A. Okay.</div> <div>15 Q. As of December 19, 2024, what cars did</div> <div>16 Paramount own? So in the name of the</div> <div>17 Paramount Management Group?</div> <div>18 A. The car that I had. I think that's it</div> <div>19 at that point. Dennis had a company car but</div> <div>20 that was transferred earlier.</div> <div>21 Q. When was that transferred?</div> <div>22 A. When he separated. I don't know the</div> <div>23 date.</div> <div>24 Q. September/October timeframe?</div> <div>25 A. Yeah.</div> </div> </div>

<div>73</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 31 of 810</div> <p>1 Q. Mr. Heller, did he have a company car</p> <p>2 on December 1st, 2024?</p> <p>3 <b>A. Not to my knowledge.</b></p> <p>4 Q. Did he have a company car at any point</p> <p>5 in 2024?</p> <p>6 <b>A. Not to my knowledge.</b></p> <p>7 Q. Did Paramount ever have a company</p> <p>8 Ferrari?</p> <p>9 <b>A. I did.</b></p> <p>10 Q. You did. And what was that?</p> <p>11 <b>A. It was a 2017 Ferrari California T.</b></p> <p>12 Q. And Paramount paid for that?</p> <p>13 <b>A. It did.</b></p> <p>14 Q. How much?</p> <p>15 <b>A. I think it was \$70,000 on top of a</b></p> <p>16 <b>trade that we already had. So I think it was</b></p> <p>17 <b>like 140, maybe, 150.</b></p> <p>18 Q. Where was that car purchased from?</p> <p>19 <b>A. Sterling Motor Cars.</b></p> <p>20 Q. Did the company ever own a company</p> <p>21 Porsche?</p> <p>22 <b>A. I know Daryl owned a Porsche but I</b></p> <p>23 <b>don't know if it was owned by the company or</b></p> <p>24 <b>him.</b></p> <p>25 Q. Was there more than one Porsche owned</p>	<div>75</div> <p>1 Q. Who all had company cars?</p> <p>2 <b>A. I did.</b></p> <p>3 Q. Who else?</p> <p>4 <b>A. Dennis had one. And probably Daryl if</b></p> <p>5 <b>that's on Paramount's books. I don't know if</b></p> <p>6 <b>it was or not.</b></p> <p>7 Q. Other than the Mercedes you already</p> <p>8 described, did the company own any other</p> <p>9 Mercedes?</p> <p>10 <b>A. No. Not to my knowledge.</b></p> <p>11 Q. And when I say -- I'm asking about</p> <p>12 during your tenure. You couldn't possibly</p> <p>13 know before you were there.</p> <p>14 Any Cadillacs?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. What did the company own?</p> <p>17 <b>A. I had -- that was one of the trades</b></p> <p>18 <b>that I did. It was a -- what was it? It was</b></p> <p>19 <b>an SUV. I forget the model. Yes. I had a</b></p> <p>20 <b>Cadillac SUV.</b></p> <p>21 Q. Was it an Escalade?</p> <p>22 <b>A. Yes, it was.</b></p> <p>23 Q. What was it purchased for?</p> <p>24 <b>A. I don't remember the amount. One</b></p> <p>25 <b>hundred thousand, 115,000. Something. Again,</b></p>
<div>74</div> <p>1 by the company on your tenure?</p> <p>2 <b>A. Yes. I had a Porsche 911 earlier.</b></p> <p>3 <b>That's probably what I traded on the Ferrari,</b></p> <p>4 <b>I think.</b></p> <p>5 Q. What was that purchased for?</p> <p>6 <b>A. How much?</b></p> <p>7 Q. Yes, sir.</p> <p>8 <b>A. I don't remember. Again, that was a</b></p> <p>9 <b>trade. So I think it was 115,000, maybe.</b></p> <p>10 Q. How about Daryl's Porsche, do you know</p> <p>11 what the company paid for that?</p> <p>12 <b>A. I don't know. I don't know. I know</b></p> <p>13 <b>about 280,000, maybe.</b></p> <p>14 Q. What company business did he conduct</p> <p>15 in the \$280,000 Porsche?</p> <p>16 <b>A. I don't know.</b></p> <p>17 Q. Did the company own any Audis?</p> <p>18 <b>A. I had an Audi RS7.</b></p> <p>19 Q. How much was that purchased for?</p> <p>20 <b>A. I don't remember. A hundred thousand.</b></p> <p>21 <b>These are all trades. So, you know, they are</b></p> <p>22 <b>basically the same.</b></p> <p>23 Q. How often did the company trade in</p> <p>24 cars?</p> <p>25 <b>A. Every couple years.</b></p>	<div>76</div> <p>1 <b>traded.</b></p> <p>2 Q. Again, back to December 1st, 2024, the</p> <p>3 only company car that you're aware of was the</p> <p>4 Mercedes referenced in your separation</p> <p>5 agreement?</p> <p>6 <b>A. That's right. Because these were all</b></p> <p>7 <b>trades. There is like one for another over</b></p> <p>8 <b>the years. So it was not all at the same</b></p> <p>9 <b>time.</b></p> <p>10 Q. Did the company own any Chevrolets?</p> <p>11 <b>A. I don't know what Dennis, if Dennis</b></p> <p>12 <b>had a Chevrolet or if he had a GMC.</b></p> <p>13 Q. Did he own a Chevy Tahoe?</p> <p>14 <b>A. Yeah. That could be it.</b></p> <p>15 Q. Do you know how much that was</p> <p>16 purchased for?</p> <p>17 <b>A. I don't know. Fifty thousand, sixty</b></p> <p>18 <b>thousand, maybe. I don't remember.</b></p> <p>19 Q. And you may have already testified to</p> <p>20 this. But did he get that car when he left?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Do you know what he paid for it?</p> <p>23 <b>A. I don't. He had paid for it</b></p> <p>24 <b>personally and when he came back to work for</b></p> <p>25 <b>Paramount we agreed to pay him for it. Daryl</b></p>

<div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc 77 1 had agreed to pay it for him. And he would 2 up -- I don't know how much it was. 3 Q. Did Paramount own computers? 4 A. You mean like notebooks? 5 Q. Laptops, desktops? 6 A. Yeah. 7 Q. For context, I have been in 8 Paramount's offices and there were no 9 computers in there. Say for four or five, do 10 you know where those computers -- how many did 11 the company own as of your departure in 12 December 2024? 13 A. I have no idea. I'm going to say we 14 had, I can estimate, I think probably 70. 15 Q. And do you know where those computers 16 are now? 17 A. I don't. 18 Q. Do you know where they would have been 19 as of mid December? 20 A. I don't. Well, as of mid December, 21 before everybody left, before everybody was 22 terminated, I would say they were in the 23 possession of the individual employees. 24 Q. And do you believe that individual 25 employees may have taken them with them?</div>	<div>79 1 Paramount and PERE? Are you familiar with 2 that? 3 A. No. 4 Q. How about a receivable between 5 Paramount and Ult Pay? 6 A. No idea. 7 Q. Do you know what HWG is? 8 A. I don't. 9 Q. How about a receivable between 10 Paramount and Heller, Daryl Heller personally, 11 are you familiar with any receivable of that 12 kind? 13 A. No. 14 Q. Did Paramount buy a beach house in New 15 Jersey? 16 A. Daryl and I bought a beach house in 17 New Jersey. 18 Q. How was Paramount involved in the 19 funding of that beach house? 20 A. We -- Daryl and I took ownership draws 21 out of Paramount for that. 22 Q. Okay. So let's start with the 23 purchase price. When was the beach house 24 purchased? 25 A. '22.</div>
<div>78 1 A. I believe that is possible. 2 Q. Did the FBI take any of them during 3 the search? 4 A. I have no idea. 5 Q. Did the company, Paramount, loan money 6 to Raw Ventures? 7 A. I have no idea. 8 Q. Who would know that? 9 A. Dennis. 10 Q. Did the company give money to Raw 11 Ventures? 12 A. I have no idea. 13 Q. How about to Glorious? Did the 14 company loan or give money to Glorious? 15 A. There was a cannabis deal in 2017, 16 which is that Grizzly thing. But I don't know 17 what the structure of that was. I know it had 18 something to do with Paramount and Paramount 19 getting -- having some kind of a stake in the 20 real estate. I think. But that was handled 21 by Daryl. 22 Q. So you're not familiar with a 23 receivable between Paramount and Raw? 24 A. I'm not. 25 Q. How about a receivable between</div>	<div>80 1 Q. Where did the purchase money come 2 from? 3 A. It came from ownership draws from 4 Daryl and I out of Paramount. 5 Q. What do you mean by ownership draws? 6 A. So as an owner, a shareholder, the 7 withdrawals came out of our equity. 8 Q. This is on top of, in addition to the 9 salary that we described before? 10 A. This is in addition to. 11 Q. Okay. And this was in 2022. The 12 company -- let's be precise. The money that 13 was paid at the settlement table was funded 14 by -- 15 A. Draws from Paramount, yes. 16 Q. So the company paid for the beach 17 house? 18 A. No. We paid for the beach house. 19 Q. Whose bank account paid for the beach 20 house? 21 A. The money was transferred -- I don't 22 know how the money was transferred. I don't 23 know. I don't know how the money was 24 transferred in. But I know it was draws that 25 Daryl and I made as owners against our equity.</div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc</div> <div> <div>81</div> <div> <div>1 So I don't know how the cash got from one</div> <div>2 place to the other and where it came from.</div> <div>3 Q. So did you owe a receivable to the</div> <div>4 company for that beach house?</div> <div>5 A. No.</div> <div>6 Q. Did Daryl owe a receivable to the</div> <div>7 company for that beach house?</div> <div>8 A. No.</div> <div>9 Q. Did the company pay the mortgage</div> <div>10 payments on the beach house?</div> <div>11 A. They continued to make ownership draws</div> <div>12 based on our stock or equity in the company.</div> <div>13 That's what made the payments. Daryl and I</div> <div>14 took ownership draws to make those payments.</div> <div>15 Q. So if there is payments from Paramount</div> <div>16 for the benefit of the shore house, it's your</div> <div>17 position that those payments were essentially</div> <div>18 a reduction in compensation to you?</div> <div>19 A. They were a reduction in equity.</div> <div>20 Q. Explain that to me.</div> <div>21 A. So we have ownership equity. We</div> <div>22 owned -- we took draws as owners out of the</div> <div>23 equity accounts to do that.</div> <div>24 Q. I see.</div> <div>25 Well, let's put some numbers to</div> </div> </div> </div>	<div> <div>83</div> <div> <div>1 A. I did</div> <div>2 Q. How much did you receive?</div> <div>3 A. 490,000.</div> <div>4 Q. Do you still have that money?</div> <div>5 A. I don't, no.</div> <div>6 Q. Where is it?</div> <div>7 A. It's in my mortgage.</div> <div>8 Q. So you received that equity and</div> <div>9 immediately paid a bill with it?</div> <div>10 A. I paid my mortgage, yes.</div> <div>11 Q. Mortgage on your personal home?</div> <div>12 A. Yes.</div> <div>13 Q. Do you own that with your wife?</div> <div>14 A. I do.</div> <div>15 Q. Okay. Are you familiar with HCG</div> <div>16 Portfolio N?</div> <div>17 A. No.</div> <div>18 Q. HCG Portfolio M, as in Mary?</div> <div>19 A. No.</div> <div>20 Q. Are you familiar with any loans that</div> <div>21 Paramount made to any entities? So not loans</div> <div>22 that Paramount took out but Paramount loans to</div> <div>23 a person, a company, of any kind?</div> <div>24 A. Loans that Paramount made?</div> <div>25 Nothing comes to mind.</div> </div> </div>
<div> <div>82</div> <div> <div>1 it. Let's say Paramount paid \$20,000 over a</div> <div>2 year to the beach house mortgage. Did your</div> <div>3 income get reduced by 20,000 or pro rata?</div> <div>4 A. No.</div> <div>5 Q. Okay. Explain to me, then, how --</div> <div>6 explain to me how it's not Paramount's money</div> <div>7 being used on the beach house?</div> <div>8 A. Because -- I'm sorry.</div> <div>9 MR. MURPHY: Go ahead.</div> <div>10 THE WITNESS: Because, as</div> <div>11 individuals, Daryl and I are making draws and</div> <div>12 that money is accredited -- is credited to us</div> <div>13 as making those payments.</div> <div>14 BY MR. VOSS:</div> <div>15 Q. So but for the money going straight</div> <div>16 from Paramount to wherever to pay the mortgage</div> <div>17 payment, the money would have come to you and</div> <div>18 then you would have paid it?</div> <div>19 A. Well, it would have gone to an entity</div> <div>20 called DHRL. The money would go to that. And</div> <div>21 then from out of DHRL is where that would go.</div> <div>22 Q. I understand that beach house was</div> <div>23 recently sold, is that right?</div> <div>24 A. That is correct.</div> <div>25 Q. Did you receive money from that sale?</div> </div> </div>	<div> <div>84</div> <div> <div>1 Q. Okay. I see accounting entries and</div> <div>2 descriptions from some of the testimony we</div> <div>3 received today on due from/due to. Is that a</div> <div>4 terminology you're familiar with?</div> <div>5 A. I'm familiar with that term, yes.</div> <div>6 Q. So on Paramount's books and records, I</div> <div>7 saw a due to Paramount from some other</div> <div>8 Heller-related entity.</div> <div>9 A. I'm following you.</div> <div>10 Q. I'm describing that as a loan. But</div> <div>11 perhaps that's not the right terminology.</div> <div>12 And I'll just jump to my point</div> <div>13 here. I'm trying to find money that Paramount</div> <div>14 is owed from anybody in the world today.</div> <div>15 A. Understood.</div> <div>16 Q. So when I say loans or due tos, what</div> <div>17 entities owe Paramount money as of your</div> <div>18 departure in 2024?</div> <div>19 A. I don't know.</div> <div>20 Q. Who would know that?</div> <div>21 A. Dennis.</div> <div>22 Q. Did Paramount maintain liability</div> <div>23 insurance?</div> <div>24 A. Yes.</div> <div>25 Q. Who was that with?</div> </div> </div>

<div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 34 of 810</div> <div>85</div> <div>1 A. I don't know the name of the company.</div> <div>2 Dennis handled that.</div> <div>3 Q. Have you ever heard of Cincinnati</div> <div>4 Insurance Company?</div> <div>5 A. I've heard of it but I don't know if</div> <div>6 it's in the context of Paramount or anything</div> <div>7 else.</div> <div>8 Q. Okay. And hopefully we can do it</div> <div>9 without flipping to it. But in your severance</div> <div>10 agreement it references some ongoing insurance</div> <div>11 coverage. Do you have any idea what company</div> <div>12 that's with?</div> <div>13 A. Hmm-umm.</div> <div>14 Q. And if you needed to look at your</div> <div>15 agreement to refresh your recollection. Look</div> <div>16 at six. And we're going to look at Paragraph</div> <div>17 2(d), as in David, on page two of that</div> <div>18 agreement.</div> <div>19 Do you see there it talks about</div> <div>20 D&amp;O insurance and indemnification?</div> <div>21 A. Yes.</div> <div>22 Q. Do you know what company that policy</div> <div>23 is through?</div> <div>24 A. That policy was dropped.</div> <div>25 Q. When was it dropped?</div>	<div>87</div> <div>1 A. No.</div> <div>2 Q. Does Michigan or Massachusetts sound</div> <div>3 right?</div> <div>4 A. I have no idea.</div> <div>5 Q. Illinois, maybe?</div> <div>6 A. I have no idea.</div> <div>7 Q. Who would know these answers?</div> <div>8 A. Daryl.</div> <div>9 Q. Just Daryl?</div> <div>10 A. I believe so.</div> <div>11 Q. I think I know the answer to this one.</div> <div>12 But let's ask it.</div> <div>13 Did Paramount have any cash</div> <div>14 anywhere, physical U.S. currency, left in</div> <div>15 2024?</div> <div>16 A. Other than what was in the bank</div> <div>17 accounts, no. I don't know of anything else.</div> <div>18 Q. And I'm being very precise here. I'm</div> <div>19 talking about \$20 bills, \$100 bills? Is there</div> <div>20 a safe, safety deposit box, a tin, a jar?</div> <div>21 A. I think we had an ATM in the office</div> <div>22 that may have had a couple hundred dollars in.</div> <div>23 Maybe. That we used for the employees.</div> <div>24 Q. Whose money was in that ATM?</div> <div>25 A. Paramount's.</div>
<div>86</div> <div>1 A. I don't know. I asked Dennis about</div> <div>2 this. I said, where is this at. And I think</div> <div>3 like two years before or three years before</div> <div>4 somebody had made a determination and decided</div> <div>5 to end it. So it was no longer in effect.</div> <div>6 Q. So two or three years before you</div> <div>7 signed this agreement on December 12, 2024,</div> <div>8 your D&amp;O coverage did not exist?</div> <div>9 A. That's what I understand, yes.</div> <div>10 Q. Let's talk about any physical assets</div> <div>11 of the company.</div> <div>12 Are you familiar with any or do</div> <div>13 you know of any real estate that the company</div> <div>14 owned? When I say the company, I always mean</div> <div>15 Paramount to be clear.</div> <div>16 A. Understood. I don't know. There may</div> <div>17 have been something with the cannabis space.</div> <div>18 But I don't know.</div> <div>19 Q. Do you think Paramount owned</div> <div>20 potentially real estate within the cannabis --</div> <div>21 A. Possibly.</div> <div>22 Q. Do you know which cannabis entity?</div> <div>23 A. No.</div> <div>24 Q. Do you know in which state this real</div> <div>25 estate would have been?</div>	<div>88</div> <div>1 Q. That wasn't Voltaire money?</div> <div>2 A. No.</div> <div>3 Q. Any art that the company owned? And</div> <div>4 I'm really, fine art. I'm not interested in</div> <div>5 commercial --</div> <div>6 A. Not to my knowledge.</div> <div>7 Q. Okay. Any equipment above say a</div> <div>8 thousand dollars in value?</div> <div>9 A. We may have had, I don't know, that</div> <div>10 may have been leased. Other than the notebook</div> <div>11 computers, I don't know of anything else that</div> <div>12 we would have owned that had more than a</div> <div>13 thousand dollars of value. I know there was a</div> <div>14 postage machine but I think that was leased</div> <div>15 from Pitney Bowes. So I don't know if we</div> <div>16 owned that or not.</div> <div>17 Q. Any other assets of the company that</div> <div>18 you're aware of that we have not discussed so</div> <div>19 far?</div> <div>20 A. No.</div> <div>21 Q. Did Paramount sell a portfolio of ATMs</div> <div>22 called the Phonco Portfolio in 2024?</div> <div>23 A. Phonco? Yes, it did.</div> <div>24 Q. When was that sold?</div> <div>25 A. November of '24.</div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Certification in Support of Plaintiff's Motion for Summary Judgment Page 35 of 810</div> <div> <div>89</div> <div> <p>1 Q. Who was that sold to?</p> <p>2 <b>A. That was sold to John Bernard.</b></p> <p>3 Q. Where is he in the world? Do you</p> <p>4 know?</p> <p>5 <b>A. He is in -- that portfolio was in</b></p> <p>6 <b>Chicago. He was a former -- he was the one we</b></p> <p>7 <b>bought the portfolio from.</b></p> <p>8 Q. How much was it sold for?</p> <p>9 <b>A. I know that Paramount got a million</b></p> <p>10 <b>dollars at the time of sale. And I think</b></p> <p>11 <b>there was payments to occur in the future. I</b></p> <p>12 <b>don't know if they occurred or not.</b></p> <p>13 Q. What happened to the million dollars</p> <p>14 that Paramount got?</p> <p>15 <b>A. It went into Paramount's fund. Cash.</b></p> <p>16 <b>Into its account.</b></p> <p>17 Q. Was it spent?</p> <p>18 <b>A. I believe so.</b></p> <p>19 Q. What was it spent on?</p> <p>20 <b>A. I have no idea. Other than probably</b></p> <p>21 <b>vendor payments and customer payments. I</b></p> <p>22 <b>would assume. But I don't know for sure.</b></p> <p>23 Q. Who authorized that sale?</p> <p>24 <b>A. Daryl.</b></p> <p>25 Q. Fair to say that the company was</p> </div> </div> </div>	<div> <div>25 Entered 04/25/25 14:39:18 Desc Page 35 of 810</div> <div> <div>91</div> <div> <p>1 <b>came in. I believe to Paramount. So it's</b></p> <p>2 <b>not -- and there was no deferred payments</b></p> <p>3 <b>beyond that.</b></p> <p>4 Q. I appreciate the clarification. Thank</p> <p>5 you.</p> <p>6 So let's focus on Cyprus</p> <p>7 Advantage. You thought that was sold in</p> <p>8 approximately September of 2024?</p> <p>9 <b>A. September, October, yes, sometime.</b></p> <p>10 Q. And who was it sold to?</p> <p>11 <b>A. The First ISO, Dave Charles.</b></p> <p>12 Q. And can you spell that for the court</p> <p>13 reporter, The First ISO?</p> <p>14 <b>A. It's the number -- actually, stop.</b></p> <p>15 <b>Cash Depot is the name of the company. They</b></p> <p>16 <b>operated under two different entities. So</b></p> <p>17 <b>Cash Depot is the name of the company that</b></p> <p>18 <b>acquired it, I believe.</b></p> <p>19 Q. What was the price in that</p> <p>20 transaction?</p> <p>21 <b>A. I don't remember. I didn't handle it.</b></p> <p>22 <b>But I know -- I don't remember what it was.</b></p> <p>23 Q. Well, how much did Paramount receive?</p> <p>24 <b>A. I'm sorry. I don't remember the</b></p> <p>25 <b>amount.</b></p> </div> </div> </div>
<div> <div></div> <div> <div>90</div> <div> <p>1 insolvent at the time of that sale?</p> <p>2 <b>A. I would say the company -- going back</b></p> <p>3 <b>to when the definition was, yes, Paramount was</b></p> <p>4 <b>not paying its customers or vendors on time.</b></p> <p>5 Q. Is it possible that that sale was</p> <p>6 around or exactly \$3.6 million?</p> <p>7 <b>A. In total, yes.</b></p> <p>8 Q. Okay. But you believe some of the</p> <p>9 payments would have been staged?</p> <p>10 <b>A. Deferred, yes.</b></p> <p>11 Q. All right. At some point in 2024, did</p> <p>12 Paramount sell a portfolio known as the Cyprus</p> <p>13 Advantage Portfolio?</p> <p>14 <b>A. It did, yes.</b></p> <p>15 Q. When did that sale occur?</p> <p>16 <b>A. September.</b></p> <p>17 Q. Again, we're talking 2024 again?</p> <p>18 <b>A. Yes. Actually, let me amend my Phonco</b></p> <p>19 <b>thing. Because now that -- what happened was,</b></p> <p>20 <b>there was money owed, Paramount owed money.</b></p> <p>21 <b>So Phonco -- John Bernard paid the debt. I</b></p> <p>22 <b>don't know what the amount was. It was like</b></p> <p>23 <b>2.4 million plus a million. Or 2.6 million</b></p> <p>24 <b>plus a million. So that money did not come</b></p> <p>25 <b>into Paramount. I think only a million of it</b></p> </div> </div> </div>	<div> <div></div> <div> <div>92</div> <div> <p>1 Q. Is it over \$2 million?</p> <p>2 <b>A. I believe so.</b></p> <p>3 Q. Is it over three?</p> <p>4 <b>A. I believe so.</b></p> <p>5 Q. Okay. Who would know that?</p> <p>6 <b>A. Dennis would. Daryl would. Because</b></p> <p>7 <b>Daryl negotiated the whole thing.</b></p> <p>8 Q. The company was insolvent at the time</p> <p>9 of that sale?</p> <p>10 <b>A. I believe so. Based on the definition</b></p> <p>11 <b>we used before, yes.</b></p> <p>12 Q. How many ATMs were covered by the John</p> <p>13 Bernard sale? So I'm toggling back to what we</p> <p>14 discussed before. How many ATMs were in that</p> <p>15 sale, approximately?</p> <p>16 <b>A. Approximately, estimate, a thousand.</b></p> <p>17 Q. Same question regarding Cyprus</p> <p>18 Advantage. Approximately how many ATMs did</p> <p>19 that cover?</p> <p>20 <b>A. Seven, eight thousand. I'm not sure.</b></p> <p>21 Q. And a clarification question. The</p> <p>22 thousand in the Bernard sale, those are ATMs</p> <p>23 that were owned by the company?</p> <p>24 <b>A. I don't know. I believe so.</b></p> <p>25 Q. And then in the Cyprus Advantage,</p> </div> </div> </div>

<div>93</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 36 of 810</div> <div> <p>1 those were just processing rights?</p> <p>2 <b>A. That's right.</b></p> <p>3 <b>Q.</b> Any other asset sales in 2024 by</p> <p>4 Paramount?</p> <p>5 <b>A. Not that I know of.</b></p> <p>6 <b>Q.</b> Did you or anyone at Paramount</p> <p>7 evaluate what assets being sold belonged to</p> <p>8 the Funds?</p> <p>9 <b>A. I did not do anything on Cyprus. But</b></p> <p>10 <b>I did on Phonco. I asked Daryl point blank in</b></p> <p>11 <b>a text message, is this covered by anything.</b></p> <p>12 <b>Because I didn't want to be putting assets,</b></p> <p>13 <b>taking assets out of the company. He said,</b></p> <p>14 <b>no, it was clear.</b></p> <p>15 <b>Q.</b> Aside from ATMs managed for the</p> <p>16 benefit of the Funds, were there other ATMs</p> <p>17 that the company managed for other investment</p> <p>18 groups or investors?</p> <p>19 <b>A. I assume so. But I don't know.</b></p> <p>20 <b>Q.</b> Did the company manage any ATMs for</p> <p>21 the benefit of a group of entities called, The</p> <p>22 Blackford Funds?</p> <p>23 <b>A. I don't know.</b></p> <p>24 <b>Q.</b> Fair enough.</p> <p>25 I want to talk to you about a</p> </div>	<div>95</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 36 of 810</div> <div> <p>1 some degree of due diligence. But that was</p> <p>2 initially. And Pathward didn't do any of</p> <p>3 that.</p> <p>4 <b>Q.</b> What's the prior bank that you're</p> <p>5 describing? Is said Meta?</p> <p>6 <b>A. No. Meta and Pathward were all the</b></p> <p>7 <b>same company.</b></p> <p>8 Who was that? That was years</p> <p>9 and years ago. I'm not sure they're even a</p> <p>10 sponsor bank anymore. I forget the name.</p> <p>11 <b>Q.</b> And Pathward/Meta were the sponsor</p> <p>12 bank for Paramount's ISO, is that correct?</p> <p>13 <b>A. That's correct.</b></p> <p>14 <b>Q.</b> And so before that sponsorship</p> <p>15 relationship, you believe that there was</p> <p>16 another bank that sponsored Paramount as an</p> <p>17 ISO?</p> <p>18 <b>A. There was, yes. Early on. I forget</b></p> <p>19 <b>the name of them. It's escaping me.</b></p> <p>20 <b>Q.</b> If Pathward did look at any financial</p> <p>21 documents, would you have known about it?</p> <p>22 <b>A. No. Probably not. They probably</b></p> <p>23 <b>would have made the request directly to</b></p> <p>24 <b>Dennis. But they didn't look at financial</b></p> <p>25 <b>docs, to my knowledge.</b></p> </div>
<div>94</div> <div></div> <div> <p>1 bank called Pathward National Association.</p> <p>2 Are you familiar with that bank?</p> <p>3 <b>A. I am.</b></p> <p>4 <b>Q.</b> What was its relationship to</p> <p>5 Paramount?</p> <p>6 <b>A. Pathward is a sponsor bank. All ATM</b></p> <p>7 <b>ISOs need to have a sponsor bank. And they</b></p> <p>8 <b>basically made sure that all the ATM ISOs were</b></p> <p>9 <b>compliant with network rules.</b></p> <p>10 <b>Q.</b> Are you familiar with what materials</p> <p>11 at Paramount Pathward would have looked at?</p> <p>12 By materials, I mean profit and loss ledger,</p> <p>13 interviews with employee, you name it?</p> <p>14 <b>A. None of that.</b></p> <p>15 <b>Q.</b> Who would have been involved in that</p> <p>16 process?</p> <p>17 <b>A. There was no -- there was not a</b></p> <p>18 <b>process for that. The process was that, what</b></p> <p>19 <b>we were required to do was provide for every</b></p> <p>20 <b>new location an agreement that said who owned</b></p> <p>21 <b>the cash. I think we had to provide that to</b></p> <p>22 <b>them. But there was no -- there was no</b></p> <p>23 <b>financial reviews. There was no sort of</b></p> <p>24 <b>looking inside of that. Originally the</b></p> <p>25 <b>previous bank a long time ago would have done</b></p> </div>	<div>96</div> <div></div> <div> <p>1 <b>Q.</b> They didn't look at profit and loss</p> <p>2 statements?</p> <p>3 <b>A. Yeah. To my knowledge, they did not.</b></p> <p>4 <b>Q.</b> Balance sheets?</p> <p>5 <b>A. To my knowledge, they did not.</b></p> <p>6 <b>Q.</b> Tax returns?</p> <p>7 <b>A. I mean maybe Dennis knows. But to my</b></p> <p>8 <b>knowledge, they did not look at any of that.</b></p> <p>9 <b>Q.</b> They didn't look at tax returns, to</p> <p>10 your knowledge?</p> <p>11 <b>A. Correct. And I don't think they did</b></p> <p>12 <b>for anybody in the whole ATM space.</b></p> <p>13 <b>Q.</b> Did they look at a source of funds for</p> <p>14 the company?</p> <p>15 <b>A. They did, yes. No, not source of</b></p> <p>16 <b>funds for the company. Source of funds for</b></p> <p>17 <b>the ATM. The cash that was in the ATM. They</b></p> <p>18 <b>looked at source of fund docs for that.</b></p> <p>19 <b>Q.</b> To see if, for example, the Voltaires</p> <p>20 were using their own money as opposed to</p> <p>21 Cartel money?</p> <p>22 <b>A. That's correct.</b></p> <p>23 <b>Q.</b> Did Paramount have any periodic audits</p> <p>24 or reviews that Pathward required?</p> <p>25 <b>A. Not to my knowledge.</b></p> </div>



<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc</div> <div>Q. Did you have to make any ongoing certifications to Pathward? You being Paramount. I'm sorry.</div> <div>A. Yeah. I don't recall.</div> <div>Q. And who would know the answer if there were ongoing representations?</div> <div>A. Yeah. Probably Steve Gernes if we had to do anything in recent years. But I just don't remember seeing anything like that. And we would have had operations people. But dealing with it that are -- I don't know who would have dealt with that. But it was a very transparent sort of thing. You know, as long as we provided all the necessary documentation, we were able to bring the machine live and operate it.</div> <div>Q. Okay. Are you familiar with TR31?</div> <div>A. I am.</div> <div>Q. What's your general understanding of that?</div> <div>A. This was a PCI standard upgrade for the ATMs that all ATMs needed to be compliant with.</div> <div>Q. How much money in 2024 did Paramount spend on TR31 compliance?</div> </div>	<div> <div>97</div> <div>Page 37 of 810</div> <div>ATMs Paramount needed to replace wholly to become TR31 compliant?</div> <div>A. I don't have the numbers. But the approximate estimates, the last I remember it was a third, a third, a third. So a third of the machines needed to be replaced. And that was for the entire global book of business. So a third of the machines needed to be replaced, a third of the machines needed an upgrade and a third needed software changes that required a software change.</div> <div>Q. One-third of -- let's see if we can put a number to it. One-third of sixteen, seventeen thousand ATMs?</div> <div>A. Yeah, that's about right.</div> <div>Q. So approximately five to six thousand ATMs needed to be replaced entirely?</div> <div>A. I'm trying to remember back. That was in -- yeah, those were the numbers we used high level. Yes, I believe that's the case.</div> <div>Q. Do you know how many of those approximately five to six thousand ATMs actually were replaced?</div> <div>A. I don't know.</div> <div>Q. Is it at or near zero?</div> </div>
<div> <div>98</div> <div>A. I don't know.</div> <div>Q. Did you have to spend a single dollar?</div> <div>A. Oh, yeah. I'm sure.</div> <div>Q. Okay. Did they spend more than 10 million?</div> <div>A. No, I don't believe so.</div> <div>Q. Okay. Do you have a budget of how much TR31 compliance would have cost for Paramount?</div> <div>A. It was about 12, 13 million, I believe.</div> <div>Q. Did, at any point in time, did you generate an estimate that Paramount's compliance would cost \$75 million?</div> <div>A. No.</div> <div>Q. To whom would TR31 expenses have been paid? Who did Paramount pay to do these services?</div> <div>A. Well, it would have been all vendors. I mean it would have been everyone. Either you had to replace the ATM. You had to upgrade the ATM with new parts. Or you could do software upgrades. It would have been everybody in the industry related to it.</div> <div>Q. Do you know approximately how many</div> </div>	<div> <div>99</div> <div>A. Paramount was always upgrading ATMs and we put those on the highest priority. When a machine would get too old, we would replace it with a new ATM. But I would say, no, I don't know the exact numbers.</div> <div>Q. More than a thousand?</div> <div>A. I don't think so.</div> <div>Q. And when were these TR31 upgrades being done, month, year, to the best of your knowledge?</div> <div>A. I'm not following what you're asking.</div> <div>Q. Were TR31 upgrades done in 2023?</div> <div>A. It was a process we had started in 2023, yeah.</div> <div>Q. And let's do it this way. As of March of 2024, how many TR31 upgrades were required? Excuse me. I said March.</div> <div>As of April of 2024, how many TR31 upgrades were still needed?</div> <div>A. I don't know. I have no idea.</div> <div>Q. Most of the five to six thousand ATMs?</div> <div>A. I would say.</div> <div>Q. How about the software upgrades, were any of them started?</div> <div>A. Oh, yeah. I'm sure of that.</div> </div>

<div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 38 of 810</div> <div>101</div> <p>Q. Okay.</p> <p><b>A. But I don't know how much. Steve Gernes would know that information. He managed that project.</b></p> <p>MR. VOSS: Can we just pause for a second?</p> <p>(A brief recess was taken.)</p> <p>MR. VOSS: I only have one copy of this. But we printed it large. Let's call it Exhibit 7.</p> <p>(Leaman Deposition Exhibit No. 7 was marked for identification.)</p> <p>BY MR. VOSS:</p> <p>Q. I'm handing the witness Leaman No. 7.</p> <p>Mr. Leaman, I'll represent to you that we found some -- we were provided some P&amp;Ls from Dennis Ream under a subpoena. And we've combined several of them together to create this six-sheet document.</p> <p>But does this look like the P&amp;Ls you were used to seeing in your time at Paramount?</p> <p><b>A. Um-hmm.</b></p> <p>MR. MURPHY: Just to be clear.</p> <p>You guys created this document from what he</p>	<div>103</div> <p><b>expecting to generate from the acquisition of companies for the year.</b></p> <p>Q. And P&amp;Ls, did they look forward or back?</p> <p><b>A. Back.</b></p> <p>Q. Back. So these should be actual results reflected on it?</p> <p><b>A. These would be, yes.</b></p> <p>Q. Okay. And we can agree that the ATM sales line across all three pages of that line are different?</p> <p><b>A. Yes, they are.</b></p> <p>Q. And I think earlier, and you were doing it from memory. So not a trap here.</p> <p>You said maybe that number was the same. Is it possible that number was the same when you did an estimated P&amp;L?</p> <p><b>A. It was part of our pro forma, yes. So the pro forma budget for the year, Daryl would give us a number that would be fixed across the month and then go from there.</b></p> <p>Q. But on the actual P&amp;Ls, which is what we're looking at here, is that the number the company actually received?</p> <p><b>A. Okay. I believe you.</b></p>
<div>102</div> <p>gave you?</p> <p>MR. VOSS: We combined several Excels. So the version that you're looking at there was created by us. But it combined several. If you want to see how they read, they sort of read like this.</p> <p>THE WITNESS: Okay.</p> <p>BY MR. VOSS:</p> <p>Q. All right. But does this generally look like the P&amp;Ls you would have seen?</p> <p><b>A. Yes.</b></p> <p>Q. And this is a big exhibit just to ask a couple of questions. See if I can do it upside down. Which I probably can't.</p> <p>But I'm pointing you to the ATM sales line. Do you see that?</p> <p><b>A. I do see that.</b></p> <p>Q. Across these six sheets?</p> <p><b>A. Um-hmm.</b></p> <p>Q. Do you know what the ATM sales line represents?</p> <p><b>A. Yes. As I testified earlier, that that was an estimate that Daryl would give us that we would put in. And this would be the -- what we were expecting or what he was</b></p>	<div>104</div> <p>Q. Well, that is a question. Is that what the company actually received?</p> <p><b>A. I don't know.</b></p> <p>Q. Okay. And what was your understanding of what that money was received for?</p> <p><b>A. My understanding was the companies that we would acquire, the ATMs inside those companies we would acquire would be billed to the various investors.</b></p> <p>Q. So that line includes money that the plaintiff funds, in this case, would have given to Paramount?</p> <p><b>A. I don't know. I'm assuming. I don't know. I don't know. All I know is this is the number that Daryl would put in. We would then report this and however Dennis reported it. We never even really looked at it. We just went down to adjust it NOI. So I believe that, I mean when we looked at it and reviewed it together. If Dennis told you, then that's what it is.</b></p> <p>Q. I don't have testimony from Mr. Ream on this. What I have is the P&amp;Ls.</p> <p>But your understanding of this line is, it was money invested by the</p>

<div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 39 of 810</div> <div>105</div> <p>1 investors under the MSAs?</p> <p>2 <b>A. No.</b></p> <p>3 <b>Q.</b> What was your understanding?</p> <p>4 <b>A. I understand that was revenue that was</b></p> <p>5 <b>generated. I don't know. From the</b></p> <p>6 <b>acquisition and the sale and the deployment of</b></p> <p>7 <b>machines. But I don't know where that money</b></p> <p>8 <b>and what the MSA's were that were tied to</b></p> <p>9 <b>this.</b></p> <p>10 <b>Q.</b> Did you understand that money was</p> <p>11 coming from the Funds?</p> <p>12 <b>A. Yes.</b></p> <p>13 <b>Q.</b> And the money, I'm talking about the</p> <p>14 ATM sales line. That's money from the Funds?</p> <p>15 <b>A. I don't know. I don't know.</b></p> <p>16 <b>Q.</b> Who would know that?</p> <p>17 <b>A. Dennis would know that.</b></p> <p>18 <b>Q.</b> Okay. Where, in your view, would</p> <p>19 money from the Funds have appeared on the</p> <p>20 P&amp;L's? Funds that they invested in the MSAs,</p> <p>21 where would it go?</p> <p>22 <b>A. I thought that was all on the balance</b></p> <p>23 <b>sheet.</b></p> <p>24 <b>Q.</b> Well, on the P&amp;L, is it reflected?</p> <p>25 <b>A. As I know it, this is revenue. This</b></p>	<div>107</div> <p>1 <b>knowledge, is not the cash that came in. I</b></p> <p>2 <b>don't know what cash came in.</b></p> <p>3 So it was invoiced. And that's</p> <p>4 what was recorded on here.</p> <p>5 <b>Q.</b> So your P&amp;Ls don't reflect actuals,</p> <p>6 they reflect cash not received?</p> <p>7 <b>A. As I understand, as an ATM was bought</b></p> <p>8 <b>or group of ATMs that were bought, they were</b></p> <p>9 <b>invoiced to the different companies or</b></p> <p>10 <b>investors. And that's what that reflects.</b></p> <p>11 <b>That's not a reflection, in my estimation, of</b></p> <p>12 <b>the cash coming into the company. I don't</b></p> <p>13 <b>even know if the cash -- that cash came into</b></p> <p>14 <b>the company.</b></p> <p>15 <b>Q.</b> Did you see the FNB bank statement</p> <p>16 every month?</p> <p>17 <b>A. No.</b></p> <p>18 <b>Q.</b> Who looked at that?</p> <p>19 <b>A. Dennis.</b></p> <p>20 <b>Q.</b> Okay. But you don't know that it's</p> <p>21 not. But it could be money that the company</p> <p>22 actually received, the ATM sales line?</p> <p>23 <b>A. Well, I would suspect that it was --</b></p> <p>24 <b>yeah. I mean I guess. I don't know.</b></p> <p>25 MR. MURPHY: Don't guess.</p>
<div>106</div> <p>1 <b>is the revenue that's generated by it. But in</b></p> <p>2 <b>terms of the money coming in, I don't know.</b></p> <p>3 <b>There is no connection in my mind from this to</b></p> <p>4 <b>that.</b></p> <p>5 <b>Q.</b> So you don't believe the ATM sales</p> <p>6 line reflects money that the Funds paid</p> <p>7 Paramount to purchase ATMs under the MSAs?</p> <p>8 You don't believe that's what it referred to?</p> <p>9 <b>A. I believe that's what it was invoiced.</b></p> <p>10 <b>But I don't believe that's what actually</b></p> <p>11 <b>got -- I don't know if it got received or what</b></p> <p>12 <b>got received by the company. I know that's</b></p> <p>13 <b>what was invoiced on the bill of sale going</b></p> <p>14 <b>out. That's the only thing I know. But I</b></p> <p>15 <b>don't connect the bill of sale and the cash</b></p> <p>16 <b>coming in to say that that's one and the same.</b></p> <p>17 <b>I don't know that that's actually the case.</b></p> <p>18 <b>Q.</b> Let me see if I understand.</p> <p>19 So you believe that that number</p> <p>20 on the P&amp;L, which looks back, is not money</p> <p>21 that the company actually received?</p> <p>22 <b>A. I know that it is invoiced to whatever</b></p> <p>23 <b>company, whatever investor, whether it's the</b></p> <p>24 <b>Funds, to Prestige or any other entity. I</b></p> <p>25 <b>know that's what's invoiced. But that, to my</b></p>	<div>108</div> <p>1 THE WITNESS: I don't know.</p> <p>2 BY MR. VOSS:</p> <p>3 <b>Q.</b> One more line. We're going to look at</p> <p>4 the line called, PE Debt Payment. What is</p> <p>5 that?</p> <p>6 <b>A. I don't know exactly.</b></p> <p>7 <b>Q.</b> Is it possible that reflects payments</p> <p>8 to the Funds?</p> <p>9 <b>A. Possible, I guess. But I don't know.</b></p> <p>10 <b>Q.</b> Who would know the answer?</p> <p>11 <b>A. Dennis would.</b></p> <p>12 <b>Q.</b> If ATM sales stopped in any given</p> <p>13 month, would the company still have been able</p> <p>14 to make those PE debt payments?</p> <p>15 <b>A. I don't know.</b></p> <p>16 <b>Q.</b> Well, let's try it this way.</p> <p>17 Is the operating revenue of the</p> <p>18 company sufficient to pay the PE debt payments</p> <p>19 without new ATM sales?</p> <p>20 <b>A. No.</b></p> <p>21 <b>Q.</b> Okay. We can talk about housekeeping</p> <p>22 of this later. But it's kind of a funny</p> <p>23 exhibit for you. But maybe we can number the</p> <p>24 pages. We'll handle the housekeeping</p> <p>25 afterwards.</p>

<div> <div>109</div> <div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 40 of 810</div> <div> <p>1 Was there a discussion between you and Daryl to sell Paramount at any point in 2024?</p> <p>2 <b>A. Yeah. Through text, yes.</b></p> <p>3 <b>Q. Was there more than one deal discussed?</b></p> <p>4 <b>A. There was no deals discussed. It was talked conceptually that Paramount, that Daryl might sell Paramount. But there was no deal. There was no -- nothing beyond just a simple conversation about should we sell or can we sell or what's going to happen with it.</b></p> <p>5 <b>Q. Did you see any deal paperwork?</b></p> <p>6 <b>A. No.</b></p> <p>7 <b>Q. Do you know who the potential deal partner was?</b></p> <p>8 <b>A. I didn't know there was a deal partner.</b></p> <p>9 <b>Q. Okay. In September, October, November '24, are you aware of Daryl being in discussions to sell the company with anyone in particular?</b></p> <p>10 <b>A. No. I think the only thing I knew of is that he was raising capital to refinance and that there were going to be new partners</b></p> </div> </div> </div>	<div> <div>111</div> <div> <div>25 Entered 04/25/25 14:39:18 Desc Page 40 of 810</div> <div> <p>1 To purchase the Funds' interests under the MSAs?</p> <p>2 <b>A. No.</b></p> <p>3 <b>Q. You never saw a deal for approximately \$450 million?</b></p> <p>4 <b>A. No.</b></p> <p>5 <b>Q. Okay. I'll represent to you that deal exists. It's a court record filed in this case.</b></p> <p>6 You never saw that deal?</p> <p>7 <b>A. No.</b></p> <p>8 <b>Q. You weren't involved in its negotiations?</b></p> <p>9 <b>A. No.</b></p> <p>10 <b>Q. Do you have any idea how it would have been funded?</b></p> <p>11 <b>A. No.</b></p> <p>12 <b>Q. Okay.</b></p> <p>13 <b>A. That's a lot of money.</b></p> <p>14 <b>Q. Agreed.</b></p> <p>15 Were you ever on a flight where a bag of cash was on the flight?</p> <p>16 <b>A. No.</b></p> <p>17 <b>Q. Are you aware of flights related to Paramount or PowerCoin where bags of cash were</b></p> </div> </div> </div>
<div> <div>110</div> <div> <p>1 coming in to Heller Capital, all of his companies. And that included Paramount. So if that's what you're referring to. But I don't know anything about it other than I knew that's what he was thinking at the time.</p> <p>2 <b>Q. I may have asked my question too precisely. So let's try it this way, then, as well.</b></p> <p>3 Are you aware of any deal in September, October, November of '24, that timeframe, that Daryl was trying to put in place to buy out the investors, the Fund investors? The plaintiff Funds in this case.</p> <p>4 <b>A. Specifically, I don't know. I know that's what the plan was. But I don't know anything about any of that.</b></p> <p>5 <b>Q. Were you aware of an asset purchase agreement between the Funds and Paramount?</b></p> <p>6 <b>A. Between the Funds --</b></p> <p>7 <b>Q. And Paramount?</b></p> <p>8 <b>A. What Funds are you referring to?</b></p> <p>9 <b>Q. The plaintiff Funds. I'm sorry. The plaintiffs in this case.</b></p> <p>10 <b>A. An asset deal to purchase Paramount, did you say?</b></p> </div> </div>	<div> <div>112</div> <div> <p>1 flown somewhere?</p> <p>2 <b>A. I am aware of that.</b></p> <p>3 <b>Q. What's your understanding of that?</b></p> <p>4 <b>A. There was PowerCoin, which was -- not PowerCoin. Sorry. Margo. Which had the machines for the Bitcoin. They were unable to get armored carriers to unload the machines. So they did what they called, I think Dennis called it a tiger team and they would grab, go get bags of cash. And because it was Bitcoin machines, you don't just deposit that cash in any bank. It had to be deposited in specific banks.</b></p> <p>5 <b>Q. Do you know which banks were used for the deposit?</b></p> <p>6 <b>A. No. I just heard about it in sort of casual conversation.</b></p> <p>7 <b>Q. I see you're an owner in PowerCoin. Were you an officer of any kind in PowerCoin?</b></p> <p>8 <b>A. No. Not to my knowledge.</b></p> <p>9 <b>Q. Okay. And did I misstate that? Did you have an ownership interest?</b></p> <p>10 <b>A. I did have an ownership stake, yes.</b></p> <p>11 <b>Q. Do you have any idea how much cash was in these bags?</b></p> </div> </div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 41 of 810</div> <div>113</div> <div> <p>1 <b>A. No idea.</b></p> <p>2 <b>Q.</b> Do you know if any of these bags of</p> <p>3 cash were flown abroad?</p> <p>4 <b>A. No idea.</b></p> <p>5 <b>Q.</b> Let's focus on '24. Did Paramount</p> <p>6 make any payments to Daryl Heller? Daryl</p> <p>7 Heller personally. Not an entity. From</p> <p>8 Paramount to Daryl Heller?</p> <p>9 <b>A. I don't recall any.</b></p> <p>10 <b>Q.</b> How about '23?</p> <p>11 <b>A. I don't recall any. And Dennis would</b></p> <p>12 <b>know those things. Because I don't get</b></p> <p>13 <b>involved in that.</b></p> <p>14 <b>Q.</b> Again, focusing on 2024. Did</p> <p>15 Paramount make payments to Heller Capital?</p> <p>16 <b>A. I believe it did. Like I said,</b></p> <p>17 <b>related to that payroll issue that time. But</b></p> <p>18 <b>I don't know of any others.</b></p> <p>19 <b>Q.</b> How about for management services?</p> <p>20 <b>A. Yeah, I don't know.</b></p> <p>21 <b>Q.</b> What management services, if any, did</p> <p>22 Heller Capital provide to Paramount?</p> <p>23 <b>A. Human resources. Everything related</b></p> <p>24 <b>to human resources and payroll. Project</b></p> <p>25 <b>management. Consulting with leadership</b></p> </div> </div>	<div> <div>115</div> <div> <p>1 <b>Q.</b> Are you aware of inquiries from Heller</p> <p>2 Capital to Paramount for information, just in</p> <p>3 general?</p> <p>4 <b>A. I mean related to the HR and the</b></p> <p>5 <b>functions that the management services, yeah.</b></p> <p>6 <b>I mean I think it would have been HR stuff</b></p> <p>7 <b>that they would have had requested from us and</b></p> <p>8 <b>we would have provided related to employees.</b></p> <p>9 <b>Q.</b> Let me be real specific here.</p> <p>10 Are you familiar with the</p> <p>11 acronym KPI?</p> <p>12 <b>A. I am.</b></p> <p>13 <b>Q.</b> What does that stand for?</p> <p>14 <b>A. Key performance indicator.</b></p> <p>15 <b>Q.</b> Okay. Are you aware of any inquiries</p> <p>16 from Heller Capital to Paramount for KPI data?</p> <p>17 <b>A. Yes. But I don't really -- I don't</b></p> <p>18 <b>think we provided it other than we had a KPI</b></p> <p>19 <b>deck as part of our monthly financial deck</b></p> <p>20 <b>that we would have provided to Daryl.</b></p> <p>21 <b>Q.</b> And why would Heller Capital not have</p> <p>22 received the KPI data?</p> <p>23 <b>A. I don't know that they requested it.</b></p> <p>24 <b>Q.</b> Well, let me set some context.</p> <p>25 I will represent to you that I</p> </div> </div>
<div> <div>114</div> <div> <p>1 <b>consulting. See, what else? That's it.</b></p> <p>2 <b>Q.</b> How much was Paramount paying to</p> <p>3 Heller Capital for those services?</p> <p>4 <b>A. I don't know.</b></p> <p>5 <b>Q.</b> When you were at Paramount, did you</p> <p>6 have access to all books and records of the</p> <p>7 company?</p> <p>8 <b>A. No. I got -- I received a monthly</b></p> <p>9 <b>portfolio or book that detailed all the</b></p> <p>10 <b>financials. But I didn't have access to the</b></p> <p>11 <b>accounting system.</b></p> <p>12 <b>Q.</b> Well, when I mean access. Was there</p> <p>13 anything, if you had wanted it, you couldn't</p> <p>14 get?</p> <p>15 <b>A. No. I could ask for anything and I</b></p> <p>16 <b>think I would get it.</b></p> <p>17 <b>Q.</b> Did you ever ask for files from Daryl</p> <p>18 that he said no to?</p> <p>19 <b>A. No. I never asked for files from</b></p> <p>20 <b>Daryl.</b></p> <p>21 <b>Q.</b> How about from Heller Capital, was</p> <p>22 there any information you asked for from them</p> <p>23 that was refused to you?</p> <p>24 <b>A. I didn't ask for anything from Heller</b></p> <p>25 <b>Capital.</b></p> </div> </div>	<div> <div>116</div> <div> <p>1 deposited Aaron Fogleman and he represented that</p> <p>2 he requested KPI data from Paramount and it</p> <p>3 was refused to him.</p> <p>4 <b>A. Okay.</b></p> <p>5 <b>Q.</b> Are you familiar with that incident at</p> <p>6 all?</p> <p>7 <b>A. I am not.</b></p> <p>8 <b>Q.</b> Okay. Other than the records you</p> <p>9 produced in response to this subpoena, do you</p> <p>10 have any other books and records belonging to</p> <p>11 the company?</p> <p>12 <b>A. No.</b></p> <p>13 <b>Q.</b> We'll do this by different types.</p> <p>14 So when was the last time you</p> <p>15 had a face-to-face conversation with Daryl</p> <p>16 Heller?</p> <p>17 <b>A. I think January -- sorry. December</b></p> <p>18 <b>when I was transferring the car. He was on</b></p> <p>19 <b>the phone, pulled in my driveway and signed to</b></p> <p>20 <b>transfer the car over.</b></p> <p>21 <b>Q.</b> What did you talk about?</p> <p>22 <b>A. Nothing. He was on the phone. And he</b></p> <p>23 <b>just reached out, signed and left.</b></p> <p>24 <b>Q.</b> When is the last time you talked to</p> <p>25 him on the phone?</p> </div> </div>

<div>117</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 42 of 810</div> <div>1 A. I don't remember. Before I left.</div> <div>2 November, December.</div> <div>3 Q. And then how about by text, when is</div> <div>4 the last time you talked to him?</div> <div>5 A. I texted him -- oh. I texted him this</div> <div>6 week because I had a -- Illinois is coming</div> <div>7 after me for taxes because Paramount is not</div> <div>8 paying. And I said, you know, can you have</div> <div>9 somebody from Paramount take care of this?</div> <div>10 Q. Did he respond to that text?</div> <div>11 A. He did. He said he needed to talk to</div> <div>12 his attorneys.</div> <div>13 MR. VOSS: Counsel, are those</div> <div>14 text messages reflected in your production</div> <div>15 from yesterday?</div> <div>16 THE WITNESS: No. It had</div> <div>17 nothing to do with the movement of funds and</div> <div>18 things that you requested.</div> <div>19 MR. VOSS: Okay. I'll ask for</div> <div>20 those texts to be preserved and I'll likely</div> <div>21 make a request for production via separate</div> <div>22 subpoena, if needed.</div> <div>23 MR. MURPHY: Sure.</div> <div>24 BY MR. VOSS:</div> <div>25 Q. Who is left at Paramount?</div>	<div>119</div> <div>25 Entered 04/25/25 14:39:18 Desc Page 42 of 810</div> <div>2 Q. Did you see them at the time they were</div> <div>3 created or later?</div> <div>4 A. I know I signed some of them. I don't</div> <div>5 recall when they were created or what they</div> <div>6 were related to at the time. Before I would</div> <div>7 sign anything related to the investors, I</div> <div>8 would ask Daryl if it was okay to sign.</div> <div>9 Q. What was your understanding of what</div> <div>10 those agreements did? What was happening</div> <div>11 under those agreements?</div> <div>12 A. I think it was Paramount is going to</div> <div>13 manage the terminals, make sure that, you</div> <div>14 know, from a management standpoint, Paramount</div> <div>15 is going to manage them. That was the</div> <div>16 management services is what Paramount did,</div> <div>17 which was make sure they stayed up and running</div> <div>18 and maintained and all of that.</div> <div>19 Q. So it's your understanding that the</div> <div>20 purchase price of ATMs were negotiated within</div> <div>21 those MSAs?</div> <div>22 A. That was not my understanding.</div> <div>23 Q. Okay. How about the time for</div> <div>24 placement, did you understand the MSAs to have</div> <div>25 a time for placement?</div>
<div>118</div> <div>1 A. I don't know.</div> <div>2 Q. So what is your understanding of who</div> <div>3 is going to take care of this?</div> <div>4 A. I don't know. I know he still has</div> <div>5 some employees that are still working. So I</div> <div>6 assumed one of them. But it's likely not</div> <div>7 going to happen because I'm going to have to</div> <div>8 take care of it myself.</div> <div>9 Q. Which employees?</div> <div>10 A. I don't know.</div> <div>11 Q. And who do you think they work for?</div> <div>12 A. I think he still has an accounting</div> <div>13 person or two working for him.</div> <div>14 Q. Are you familiar with Luma Financial</div> <div>15 Group?</div> <div>16 A. No.</div> <div>17 Q. Have you ever heard of that?</div> <div>18 A. Never heard of them.</div> <div>19 Q. I think I did ask you this before.</div> <div>20 But I'm not certain. So I'll ask it again.</div> <div>21 Did you see the MSAs between the</div> <div>22 Funds and Paramount?</div> <div>23 A. I believe that was a document that was</div> <div>24 signed that Paramount agreed to manage the</div> <div>25 terminals. I believe that's what it was. I</div>	<div>120</div> <div>1 A. No.</div> <div>2 Q. If I said it was within a 75-day</div> <div>3 period, does that sound right to you?</div> <div>4 A. I have no idea.</div> <div>5 Q. Do you think, is it your understanding</div> <div>6 of those MSAs that ATMs would be purchased and</div> <div>7 never placed in service?</div> <div>8 A. No. I know Daryl mentioned that that</div> <div>9 was -- that there was allowed to be machines</div> <div>10 purchased and not deployed for a time. But it</div> <div>11 never would have not been something we ever</div> <div>12 discussed.</div> <div>13 Q. What's your general understanding of</div> <div>14 Prestige Investment Group?</div> <div>15 A. My general understanding is that</div> <div>16 Prestige Investment Group would go out and</div> <div>17 raise capital. Raise funds.</div> <div>18 Q. For --</div> <div>19 A. And manage the -- for Paramount and</div> <div>20 other entities.</div> <div>21 Q. Okay. What was your understanding of</div> <div>22 the relationship between Prestige and</div> <div>23 Paramount?</div> <div>24 A. I'm not sure I understand the</div> <div>25 question.</div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 43 of 810</div> <div> <div>121</div> <div>Q. What did Prestige do for Paramount and Certification in Support</div> <div> <div>1</div> <div>2 what did Paramount do for Prestige?</div> <div>3 <b>A. As I understand it, Prestige went out,</b></div> <div>4 <b>found investors, raised capital, managed</b></div> <div>5 <b>everything related to the cash and the funds</b></div> <div>6 <b>with them and Paramount would manage the books</b></div> <div>7 <b>of business it acquired on behalf of those</b></div> <div>8 <b>funds.</b></div> <div>9 Q. Okay. Did you understand that</div> <div>10 Prestige was giving money to Paramount to</div> <div>11 purchase ATMs?</div> <div>12 <b>A. Yes.</b></div> <div>13 Q. Do you understand that Paramount owed</div> <div>14 money to Prestige?</div> <div>15 <b>A. Yes.</b></div> <div>16 Q. And you understood that that was a</div> <div>17 monthly payment?</div> <div>18 <b>A. Yes.</b></div> <div>19 Q. Did you understand it to be a monthly</div> <div>20 minimum payment, meaning --</div> <div>21 <b>A. I had heard that in passing years and</b></div> <div>22 <b>years ago that there was a minimum. But Daryl</b></div> <div>23 <b>said he was revising that. That's just back</b></div> <div>24 <b>when it first started, he was revising it. I</b></div> <div>25 <b>didn't know there was a minimum.</b></div> </div> </div> </div>	<div> <div>123</div> <div>Q. You didn't see them.</div> <div> <div>2</div> <div>3 Who created them?</div> <div>4 <b>A. The bill of sales?</b></div> <div>5 <b>Q. Yeah.</b></div> <div>6 <b>A. I don't know. Somebody in Dennis'</b></div> <div>7 <b>department, I believe.</b></div> <div>8 Q. Are you familiar with the PH</div> <div>9 placeholder indication on those bills of sale?</div> <div>10 <b>A. I became familiar after the hearing.</b></div> <div>11 Q. What is your understanding of what PH</div> <div>12 meant?</div> <div>13 <b>A. Placeholder meant that --</b></div> <div>14 MR. MURPHY: Just to clarify.</div> <div>15 Is this your understanding after the hearing</div> <div>16 or your understanding while you were working</div> <div>17 there?</div> <div>18 THE WITNESS: No, not while I</div> <div>19 was working there. I only found out about it</div> <div>20 after the hearing. So based on, yeah, after</div> <div>21 the hearing.</div> <div>22 So, as I understand it, it was</div> <div>23 a -- when a machine would get deployed or a</div> <div>24 company would get acquired, they wouldn't have</div> <div>25 serial numbers so they would put a placeholder</div> </div> </div>
<div> <div>122</div> <div>Q. And this is a real mechanical</div> <div> <div>1</div> <div>2 question.</div> <div>3 Where did the Prestige money go</div> <div>4 first? Did it go into FNB? Did it go into</div> <div>5 M&amp;T? Did it go into Jonestown Bank? Where</div> <div>6 did the money go first?</div> <div>7 <b>A. I have no idea.</b></div> <div>8 Q. What entity did it go into?</div> <div>9 <b>A. I have no idea.</b></div> <div>10 Q. Did it go into Paramount?</div> <div>11 <b>A. I don't know.</b></div> <div>12 Q. Who would know?</div> <div>13 <b>A. Dennis would know.</b></div> <div>14 Q. And I forget your answer to this. So</div> <div>15 I know I asked you this question.</div> <div>16 Did you see the FNB monthly bank</div> <div>17 statement?</div> <div>18 <b>A. No.</b></div> <div>19 Q. Did you ever see bills of sale between</div> <div>20 Paramount and the Fund, the plaintiff Fund in</div> <div>21 this case?</div> <div>22 <b>A. No.</b></div> <div>23 Q. You did not.</div> <div>24 You didn't create them, then, I</div> <div>25 take it?</div> </div> </div>	<div> <div>124</div> <div>in to represent that because it was too costly</div> <div> <div>1</div> <div>2 to go out and go buy those. Or pull them off</div> <div>3 the machines and put them in there.</div> <div>4 BY MR. VOSS:</div> <div>5 Q. Any reason placeholder numbers or any</div> <div>6 number on the bills of sale should repeat on</div> <div>7 different bills of sale?</div> <div>8 <b>A. Not that I know of.</b></div> <div>9 Q. Okay. Where did the Prestige</div> <div>10 investment money go? Where is it today?</div> <div>11 <b>A. I don't know.</b></div> <div>12 Q. Five hundred million invested over the</div> <div>13 course of three to four years, unfunded</div> <div>14 principal of four hundred million, where is it</div> <div>15 today?</div> <div>16 <b>A. I don't know.</b></div> <div>17 Q. You have no guesses?</div> <div>18 <b>A. I have no guesses.</b></div> <div>19 Q. No estimates?</div> <div>20 <b>A. No.</b></div> <div>21 Q. Who would know?</div> <div>22 <b>A. Dennis.</b></div> <div>23 Q. Just Dennis?</div> <div>24 <b>A. Daryl.</b></div> <div>25 Q. And Daryl?</div> </div> </div>

<div>125</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 44 of 810</div> <div>1 A. Um-hmm. Certification in Support of BitStop?</div> <div>2 Q. Okay. Let's talk about, have you</div> <div>3 sought indemnification from anybody for your</div> <div>4 attorney's fees?</div> <div>5 A. Have I sought --</div> <div>6 Q. Sought indemnification.</div> <div>7 A. Oh, yes, I have.</div> <div>8 Q. I'm sorry. I muddled that.</div> <div>9 Sought indemnification?</div> <div>10 A. Yes. As part of my separation</div> <div>11 agreement, anything that I would have for</div> <div>12 attorney fees, I'm going to go -- I'm getting</div> <div>13 ready to file a claim against Daryl in</div> <div>14 bankruptcy.</div> <div>15 Q. Have you received any money for your</div> <div>16 attorney's fees?</div> <div>17 A. No. It's all coming out-of-pocket.</div> <div>18 Q. All right. Let's talk about what I'll</div> <div>19 call crypto assets.</div> <div>20 Did Paramount own any crypto</div> <div>21 assets, Bitcoin, Ethereum, whatever they're</div> <div>22 all called? Any crypto assets that Paramount</div> <div>23 owned?</div> <div>24 A. Not to my knowledge.</div> <div>25 Q. How about Heller Capital?</div>	<div>127</div> <div>2 A. BitStop was a company that PowerCoin</div> <div>3 partnered with. I think there was a mutual</div> <div>4 stock swap of PowerCoin, or PowerCoin got some</div> <div>5 of them and they got some of PowerCoin. And</div> <div>6 they were the company that provided all the</div> <div>7 software, the transaction software to run the</div> <div>8 Bitcoin machines.</div> <div>9 Q. At some point was BitStop selling</div> <div>10 Bitcoin either to PowerCoin or for PowerCoin's</div> <div>11 benefit?</div> <div>12 A. I'm not sure.</div> <div>13 Q. Okay. Do you understand whether Daryl</div> <div>14 or any Daryl entity, Daryl Heller entity, owns</div> <div>15 an interest in BitStop?</div> <div>16 A. Well, I think PowerCoin does.</div> <div>17 Q. PowerCoin --</div> <div>18 A. I think they do. I think they have a</div> <div>19 stake in BitStop. I think it was a swap.</div> <div>20 Q. Is PowerCoin a going concern?</div> <div>21 A. I have no idea.</div> <div>22 Q. How about BitStop?</div> <div>23 A. I have no idea.</div> <div>24 Q. Have you ever heard of an entity</div> <div>25 called Golden Gate?</div>
<div>126</div> <div>1 A. Not to my knowledge. But I don't</div> <div>2 know. I don't know. Yes, I don't know.</div> <div>3 Q. How about Daryl Heller personally?</div> <div>4 A. I don't know.</div> <div>5 Q. How about any Heller Capital entity,</div> <div>6 anything under the umbrella of Heller Capital,</div> <div>7 hundreds of entities, do any of those own</div> <div>8 crypto assets?</div> <div>9 A. I think PowerCoin did.</div> <div>10 Q. Okay.</div> <div>11 A. Because it needed to buy it, to run</div> <div>12 the machines, it would buy crypto. And it</div> <div>13 would then, as people bought it, they would</div> <div>14 transfer it to the wallet. So I believe they</div> <div>15 had some.</div> <div>16 Q. Do you believe today that PowerCoin</div> <div>17 still owns any crypto assets?</div> <div>18 A. I have no idea.</div> <div>19 Q. How about the BitStop. Are you</div> <div>20 familiar with them?</div> <div>21 A. I'm familiar with them.</div> <div>22 Q. Why are you familiar with that entity</div> <div>23 or what did you understand it?</div> <div>24 Two questions there.</div> <div>25 What was your understanding of</div>	<div>128</div> <div>1 A. I did.</div> <div>2 Q. Okay. What's your understanding of</div> <div>3 Golden Gate?</div> <div>4 A. I wish I knew. I understand it to be</div> <div>5 an entity related to Paramount that was going</div> <div>6 to own the hardware for the Bitcoin machines.</div> <div>7 Q. The Bitcoin machines of whom?</div> <div>8 A. PowerCoin.</div> <div>9 Q. And did PowerCoin receive any money</div> <div>10 from Golden Gate?</div> <div>11 A. I have no idea.</div> <div>12 Q. Did Paramount receive any money from</div> <div>13 Golden Gate?</div> <div>14 A. I have no idea.</div> <div>15 Q. If I represented to you that it</div> <div>16 appears to us that Golden Gate money went to</div> <div>17 PowerCoin and went to Paramount, do you have</div> <div>18 any understanding of that?</div> <div>19 A. No.</div> <div>20 Q. Do you know when the Golden Gate</div> <div>21 investments happened, month and year?</div> <div>22 A. No. I know that about when the entity</div> <div>23 was formed. But I know nothing of</div> <div>24 investments.</div> <div>25 Q. Okay. Would it surprise you to see</div>



<div>129</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 45 of 810</div> <div>1 money from Golden Gate ending up in 2 Paramount's accounts? 3 <b>A. Yeah, because I mean I don't know what</b> 4 <b>the terms or what the deal was, what the</b> 5 <b>structure was of that company. So, yeah, it</b> 6 <b>would.</b> 7 <b>Q.</b> Okay. Have you ever heard of 8 Catapult? 9 <b>A. No.</b> 10 <b>Q.</b> All right. Assets. I think, I have 11 tried to cover everything we can think of. 12 But that's ultimately what we're trying to 13 find here, assets. 14 So in 2024, and if this number 15 is too low maybe, increase it. Let's start 16 with this. 17 Who in 2024 from Paramount, 18 either human being or entity, received more 19 than \$10,000 in a single month? If that's 20 hundreds, let's make the number bigger. 21 <b>A. Not hundreds. You mean employees?</b> 22 <b>Q.</b> So any single month. And let's be 23 real focused here. 24 Second half. So July 1st to 25 December 31, 2024, who in a single month </div>	<div>131</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 45 of 810</div> <div>1 <b>A. To Heller Capital? I have no idea.</b> 2 <b>Q.</b> Are you familiar with the assets of 3 Heller Capital? 4 <b>A. No.</b> 5 <b>Q.</b> Are you familiar with Daryl Heller's 6 personal assets? 7 <b>A. No. I did years ago get a personal</b> 8 <b>balance sheet I think by mistake. But I don't</b> 9 <b>have -- I don't have that.</b> 10 <b>Q.</b> What year was that? 11 <b>A. I don't remember. 2015, '16.</b> 12 <b>Something like that. '17. I don't remember.</b> 13 <b>Q.</b> What was the value of his personal 14 assets? 15 <b>A. I don't remember.</b> 16 <b>Q.</b> Are you familiar with any properties 17 that he owns abroad? 18 <b>A. Abroad? Define abroad.</b> 19 <b>Q.</b> Outside of the United States? 20 <b>A. Oh, no.</b> 21 <b>Q.</b> Have you ever heard of any interest in 22 the Caribbean? 23 <b>A. No.</b> 24 <b>Q.</b> Turks and Caicos? 25 <b>A. No.</b> </div>
<div>130</div> <div>1 received more than \$10,000 out of Paramount? 2 <b>A. Including employees in that?</b> 3 <b>Q.</b> Yes. 4 <b>A. Okay. So it would have been me,</b> 5 <b>Dennis, Steve. There might be six, eight</b> 6 <b>people, employees. I don't know.</b> 7 <b>Q.</b> How about companies? 8 <b>A. I don't know off the top of my head.</b> 9 <b>I'd have to look at records and things.</b> 10 <b>Q.</b> Heller Capital? 11 <b>A. I have no idea.</b> 12 <b>Q.</b> Well, wasn't there a management 13 relationship between Heller Capital and 14 Paramount? 15 <b>A. Yeah. But I don't even know what that</b> 16 <b>was. In fact, I tried to find out how much it</b> 17 <b>was and I couldn't find a number. So I have</b> 18 <b>no idea if it was more than 10,000 or more.</b> 19 <b>Q.</b> Did Heller Capital make a loan to 20 Paramount at any point in 2024? 21 <b>A. I have no idea.</b> 22 <b>Q.</b> Did Paramount pay Heller Capital in 23 excess of \$250,000 in the latter part of 2024? 24 <b>A. Did Paramount pay that to Daryl?</b> 25 <b>Q.</b> Did Heller Capital? </div>	<div>132</div> <div>1 <b>Q.</b> Curacao? 2 <b>A. No.</b> 3 <b>Q.</b> Dominican Republic? 4 <b>A. No.</b> 5 <b>Q.</b> Costa Rica? 6 <b>A. No.</b> 7 <b>Q.</b> Are you familiar with him owning any 8 crypto? 9 <b>A. I saw it in the papers.</b> 10 <b>Q.</b> Are you aware of any girlfriends or 11 paramours that Daryl Heller had? 12 <b>A. No.</b> 13 <b>Q.</b> By name? 14 <b>A. No.</b> 15 <b>Q.</b> Are you aware of gifts that 16 girlfriends or paramours would have received? 17 <b>A. No.</b> 18 <b>Q.</b> Did Daryl Heller ever talk to you 19 about a concept called the ripcord? 20 <b>A. Yes.</b> 21 <b>Q.</b> What was your understanding of the 22 ripcord concept? 23 <b>A. The ripcord, as I understood it, was</b> 24 <b>when he decided that he was going to end the</b> 25 <b>Funds and the funding strategy that Paramount</b> </div>

<div>133</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 46 of 810</div> <div>1 had and refinance like he did. That started</div> <div>2 in the spring.</div> <div>3 Q. And did Paramount ever pull the</div> <div>4 ripcord?</div> <div>5 A. Paramount didn't. I think Daryl did.</div> <div>6 Q. Okay. How did he do that?</div> <div>7 A. He sent a letter out to all the Funds</div> <div>8 and basically said the program is over.</div> <div>9 Q. What payments did they receive?</div> <div>10 A. I don't know.</div> <div>11 Q. Was it no payments?</div> <div>12 A. I don't know.</div> <div>13 Q. Who would know that?</div> <div>14 A. Dennis would know that and Daryl would</div> <div>15 know that.</div> <div>16 Q. Okay. What was your position on the</div> <div>17 ripcord proposal? Did you think it was a good</div> <div>18 idea? Did you think it was a bad idea? Do</div> <div>19 you think it worked?</div> <div>20 A. Well, it apparently didn't work.</div> <div>21 Because that's why we're here today. So at</div> <div>22 the time, I mean, to me, he had a funding</div> <div>23 strategy and he could change however he wanted</div> <div>24 to do a funding strategy. It was his company.</div> <div>25 Q. Which was his company?</div>	<div>135</div> <div>SEC attorneys. There was a time base to it.</div> <div>2 Because I think there was concern by, you</div> <div>3 know, once the investors started -- once all</div> <div>4 the problems started occurring, I forget who</div> <div>5 raised that. I think maybe Barry Rynearson or</div> <div>6 somebody. And he went and explained why it</div> <div>7 wasn't.</div> <div>8 Q. How did he explain that to you</div> <div>9 physically? My question is a physical</div> <div>10 question. Orally, by phone, in writing?</div> <div>11 A. Orally.</div> <div>12 Q. Did he ever put his explanation in</div> <div>13 writing?</div> <div>14 A. He did.</div> <div>15 Q. Okay. And what timeframe was this?</div> <div>16 A. April, May of '24.</div> <div>17 Q. What did he say to you orally?</div> <div>18 A. He said that, and he reviewed the</div> <div>19 document that he had, which I don't have, the</div> <div>20 reasons why it's not. There was like 10</div> <div>21 reasons on there.</div> <div>22 Q. And that it not being a Ponzi scheme</div> <div>23 was the current model with the investors?</div> <div>24 A. That's the way I understood it, yes.</div> <div>25 Q. And I thought I heard you say Barry</div>
<div>134</div> <div>1 A. Paramount and Prestige.</div> <div>2 Q. Well, was it your understanding that</div> <div>3 Paramount was owned by Daryl or Heller</div> <div>4 Capital?</div> <div>5 A. In my mind, it was owned by Daryl.</div> <div>6 But it was properly listed as Heller Capital.</div> <div>7 Although I don't know that.</div> <div>8 Q. Okay. Did he ever talk to you about</div> <div>9 the ripcord scheme generating a new type of</div> <div>10 business for Paramount, like a new way that</div> <div>11 they could do business after they pulled the</div> <div>12 ripcord?</div> <div>13 A. No. I mean I don't know what you're</div> <div>14 referring to.</div> <div>15 Q. Well, did he refer to like a purchase</div> <div>16 and leaseback model, like a REIT?</div> <div>17 A. I thought that's what the investor</div> <div>18 model was.</div> <div>19 Q. Okay. Did he ever explain to you why</div> <div>20 it's not a Ponzi scheme?</div> <div>21 A. He did in April.</div> <div>22 Q. And what did he explain to you?</div> <div>23 A. April 24th. He basically said it's</div> <div>24 not and here are the reasons why. I don't</div> <div>25 remember what they were. But, you know, and</div>	<div>136</div> <div>1 Rynearson raised a concern. Did I hear you</div> <div>2 correctly?</div> <div>3 A. I believe so, yes.</div> <div>4 Q. What concern did Barry raise?</div> <div>5 A. When the investor started -- the whole</div> <div>6 investor issue started happening and Daryl was</div> <div>7 going to pull the ripcord on all of this</div> <div>8 program, I heard that he was concerned that</div> <div>9 maybe something wasn't being done properly and</div> <div>10 so he investigated.</div> <div>11 Q. I see.</div> <div>12 You're aware that Paramount</div> <div>13 didn't make the Fund payment in April 2024?</div> <div>14 A. Yes, I'm aware of that.</div> <div>15 Q. Why was the Fund payment not made?</div> <div>16 A. I don't know the reason. I can tell</div> <div>17 you what Daryl told me.</div> <div>18 Q. What did Daryl tell you?</div> <div>19 A. Daryl told me that Zook was under</div> <div>20 investigation by the SEC. He was expecting a</div> <div>21 funding coming from Zook in February. And</div> <div>22 that that never came through. So Daryl had to</div> <div>23 do an emergency refinance. And that's why he</div> <div>24 was doing what he was doing.</div> <div>25 Q. So he explained to you, to make</div>

<div>137</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Certification in Support</div> <div>1 payments to the Funds, he needed new fund</div> <div>2 investments?</div> <div>3 <b>A. No. He basically said that the reason</b></div> <div>4 <b>he didn't have -- that the capital wasn't</b></div> <div>5 <b>there is because he was counting on capital</b></div> <div>6 <b>coming in that he did not get.</b></div> <div>7 <b>Q. Were the investors not paid based on</b></div> <div>8 <b>operations of the ATMs?</b></div> <div>9 <b>A. Yeah. From a -- I'm telling you what</b></div> <div>10 <b>he told me the reason was.</b></div> <div>11 <b>Q. What was your understanding of how the</b></div> <div>12 <b>funds were paid?</b></div> <div>13 <b>A. It was paid based on the operations of</b></div> <div>14 <b>Paramount and on the operation, from the cash</b></div> <div>15 <b>raised by the Funds.</b></div> <div>16 <b>Q. New cash?</b></div> <div>17 <b>A. No. If it was existing cash that was</b></div> <div>18 <b>not used, then it would be paid back using</b></div> <div>19 <b>that.</b></div> <div>20 <b>Q. Okay. That's not a Ponzi scheme, in</b></div> <div>21 <b>your opinion?</b></div> <div>22 <b>A. I don't know the definition of a Ponzi</b></div> <div>23 <b>scheme.</b></div> <div>24 <b>Q. Well, using new money to pay old</b></div> <div>25 <b>obligations.</b></div>	<div>139</div> <div>COUNTY OF LANCASTER Page 47 of 810 COMMONWEALTH OF PENNSYLVANIA :</div> <div>3 I, Allen S. Blank, the undersigned Notary</div> <div>4 Public, do hereby certify that personally</div> <div>5 appeared before me, RANDALL LEAMAN, being by</div> <div>6 me first duly sworn to testify the truth, the</div> <div>7 whole truth, and nothing but the truth, in</div> <div>8 answer to the oral questions propounded to him</div> <div>9 by the attorneys for the respective parties,</div> <div>10 testified as set forth in the foregoing</div> <div>11 deposition.</div> <div>12 I further certify that before the taking</div> <div>13 of said deposition, the above witness was duly</div> <div>14 sworn, that the questions and answers were</div> <div>15 taken down stenographically by the said Allen</div> <div>16 S. Blank, Reporter-Notary Public, Paradise,</div> <div>17 Pennsylvania, approved and agreed to, and</div> <div>18 afterwards reduced to print by means of</div> <div>19 computer-assisted transcription under the</div> <div>20 direction of the said Reporter.</div> <div>21 In testimony whereof, I have hereunto</div> <div>22 subscribed my hand this 17th day of April,</div> <div>23 2025.</div> <div>24</div> <div>25</div> <div>Allen S. Blank, RMR Reporter-Notary Public</div> <div>My Commission Expires: November 26, 2025</div>
<div>138</div> <div>1 <b>A. No. I thought it was existing money,</b></div> <div>2 <b>too, the money that was already raised.</b></div> <div>3 <b>Q. Okay. We're primarily focused on</b></div> <div>4 <b>assets here. Who else do you think we should</b></div> <div>5 <b>talk to that would know about Paramount's</b></div> <div>6 <b>assets?</b></div> <div>7 <b>A. You have talked to Dennis. It would</b></div> <div>8 <b>be Dennis and Daryl basically.</b></div> <div>9 <b>Q. What assets do you think exist of</b></div> <div>10 <b>Paramount anywhere?</b></div> <div>11 <b>A. Other than the ones you mentioned,</b></div> <div>12 <b>nothing.</b></div> <div>13 <b>Q. Last question, then.</b></div> <div>14 <b>Anywhere else you think we</b></div> <div>15 <b>should look for assets? If you're me and</b></div> <div>16 <b>looking for assets of Paramount, where would</b></div> <div>17 <b>you look?</b></div> <div>18 <b>A. You've been very thorough. I would</b></div> <div>19 <b>not have any other additional recommendations.</b></div> <div>20 <b>MR. VOSS: Okay. That's the end</b></div> <div>21 <b>of the examination.</b></div> <div>22 <b>MR. MURPHY: No questions.</b></div> <div>23 <b>(Deposition concluded at 12:36</b></div> <div>24 <b>p.m.)</b></div> <div>25</div>	

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<b>Ult</b> <sup>[1]</sup> - 79:5 <b>ultimately</b> <sup>[2]</sup> - 65:23, 129:12 <b>um-hmm</b> <sup>[6]</sup> - 31:17, 33:13, 52:4, 101:23, 102:19, 125:1 <b>umbrella</b> <sup>[1]</sup> - 126:6 <b>umm</b> <sup>[1]</sup> - 85:13 <b>unable</b> <sup>[2]</sup> - 69:2, 112:6 <b>unBates</b> <sup>[1]</sup> - 25:17 <b>under</b> <sup>[25]</sup> - 6:7, 20:1, 20:21, 26:22, 30:4, 30:12, 34:5, 36:8, 36:11, 48:1, 61:10, 62:7, 70:18, 71:12, 91:16, 101:17, 105:1, 106:7, 111:1, 119:11, 126:6, 136:19, 139:11 <b>undersigned</b> <sup>[1]</sup> - 139:3 <b>understood</b> <sup>[11]</sup> - 6:5, 7:9, 20:12, 30:7, 38:6, 60:12, 84:15, 86:16, 121:16, 132:23, 135:24 <b>unemployed</b> <sup>[1]</sup> - 9:11 <b>unfortunately</b> <sup>[1]</sup> - 59:8 <b>unfunded</b> <sup>[1]</sup> - 124:13 <b>United</b> <sup>[1]</sup> - 131:19 <b>units</b> <sup>[1]</sup> - 57:21 <b>universe</b> <sup>[3]</sup> - 9:5, 30:20, 54:19 <b>unless</b> <sup>[1]</sup> - 5:23 <b>unload</b> <sup>[1]</sup> - 112:7 <b>unrelated</b> <sup>[3]</sup> - 64:12, 64:23, 65:19 <b>up</b> <sup>[16]</sup> - 5:17, 17:16, 19:12, 34:18, 40:2, 46:5, 48:15, 51:1, 52:21, 53:12, 60:13, 66:16, 77:2, 119:17, 129:1 <b>upgrade</b> <sup>[3]</sup> - 97:21, 98:22, 99:9 <b>upgrades</b> <sup>[6]</sup> - 98:23, 100:8, 100:12, 100:16, 100:19, 100:23 <b>upgrading</b> <sup>[1]</sup> - 100:1 <b>upside</b> <sup>[1]</sup> - 102:14	56:25, 58:3, 104:9 <b>Vegas</b> <sup>[4]</sup> - 14:4, 14:12, 14:16, 15:1 <b>vehicle</b> <sup>[1]</sup> - 35:17 <b>vendor</b> <sup>[2]</sup> - 68:5, 89:21 <b>vendors</b> <sup>[7]</sup> - 47:4, 47:10, 47:13, 47:14, 69:3, 90:4, 98:19 <b>ventures</b> <sup>[2]</sup> - 78:6, 78:11 <b>version</b> <sup>[1]</sup> - 102:3 <b>versus</b> <sup>[1]</sup> - 4:17 <b>via</b> <sup>[1]</sup> - 117:21 <b>view</b> <sup>[2]</sup> - 67:16, 105:18 <b>Voltaire</b> <sup>[1]</sup> - 88:1 <b>Voltaires</b> <sup>[1]</sup> - 96:19 <b>VOSS</b> <sup>[37]</sup> - 2:2, 4:14, 6:17, 7:6, 22:23, 23:4, 23:7, 24:11, 25:8, 25:12, 26:25, 27:4, 27:21, 32:8, 32:11, 37:9, 37:20, 38:3, 38:7, 38:9, 49:7, 63:4, 63:8, 68:20, 69:6, 82:14, 101:5, 101:8, 101:13, 102:2, 102:8, 108:2, 117:13, 117:19, 117:24, 124:4, 138:20 <b>Voss</b> <sup>[2]</sup> - 3:3, 4:16 <b>vs</b> <sup>[1]</sup> - 1:5	<b>wish</b> <sup>[1]</sup> - 128:4 <b>withdrawals</b> <sup>[1]</sup> - 80:7 <b>withholding</b> <sup>[1]</sup> - 63:21 <b>WITNESS</b> <sup>[14]</sup> - 7:5, 22:13, 24:8, 27:19, 37:8, 37:22, 49:5, 63:6, 68:25, 82:10, 102:7, 108:1, 117:16, 123:18 <b>Witness</b> <sup>[1]</sup> - 2:11 <b>witness</b> <sup>[5]</sup> - 23:8, 25:13, 32:12, 101:14, 139:8 <b>word</b> <sup>[1]</sup> - 51:11 <b>world</b> <sup>[3]</sup> - 57:12, 84:14, 89:3 <b>worth</b> <sup>[1]</sup> - 37:11 <b>wound</b> <sup>[1]</sup> - 77:1 <b>write</b> <sup>[1]</sup> - 5:14 <b>writing</b> <sup>[2]</sup> - 135:10, 135:13 <b>written</b> <sup>[2]</sup> - 43:5, 43:8
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<b>zero</b> <sup>[3]</sup> - 18:14, 35:16, 99:25 <b>ZIMMER</b> <sup>[1]</sup> - 2:2 <b>Zook</b> <sup>[2]</sup> - 136:19, 136:21		
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## **EXHIBIT D**

# EXHIBIT 1

7. I understand that the Plaintiffs, purportedly at the direction of Mr. Hostetter, sent



notices of termination to Paramount. I did not authorize Mr. Hostetter to send such letters or notices, the Class A Members of PIG did not vote on the exercise of rights under any of the Funds Agreements or authorize the sending of such notices.

8. I understand that the Plaintiffs, purportedly at the direction of Mr. Hostetter, have requested a special injunction that seeks the relief set out in their Proposed Special Injunction Order. The requested relief in the Proposed Special Injunction Order would result in Paramount being “immediately enjoined from holding, spending, or otherwise disposing of revenues generated under the ATM Management Service Agreements between the Plaintiffs and” Paramount. (Order ¶ 1.) It would require Paramount to “immediately deposit with the Prothonotary all revenues generated under the Funds’ MSAs for the month of August 2024[.]” (*Id.* ¶ 2.) Then Paramount would have to “deposit revenues generated under the Funds’ MSAs with the Prothonotary on each Wednesday of each week until further Order of the Court.” (*Id.*) It further requires an affirmative injunction that Paramount “take all reasonable actions to maintain and operate Plaintiffs’ ATMS.” (*Id.* ¶ 3.) And it would additionally require this Court to “approve invoices for costs necessary to maintain and operate Plaintiffs’ ATMS[.]” (*Id.* ¶ 4.)

9. If such relief were granted, Paramount would face significant and irreparable harm.

10. If Paramount were forced to relinquish control of its own funds to a third party, Paramount will face significant and likely irreparable harm to its relationships with customers and its reputation in the market. That harm is nearly impossible to quantify.

11. I believe, based on my knowledge of the Paramount’s merchant customers and the market from my time operating Paramount’s business, that significant numbers of Paramount’s merchant customers will cease to do business with Paramount if the injunction is entered. In addition, some of the agreements between Paramount and its merchant customers contain termination provisions that would allow the merchant customers to terminate the agreements if the Proposed Special Injunction Order is entered.

12. In addition to the adverse effects with Paramount’s merchant customers, many of Paramount’s employees, including employees critical to the management of the business and who maintain the business relationship with merchants, vendors, and other similar parties would leave the business due to the uncertainty of the timing and amount of payment under the Proposed Special Injunction Order.

13. I believe, based on my knowledge of the Paramount’s vendors and the market from my time operating Paramount’s business, that significant numbers of Paramount’s vendors (including but not limited to cash providers who supply the actual cash for the ATMs) will cease to do business with Paramount if the injunction is entered. In addition, some of the agreements between Paramount and its vendors contain termination provisions that would allow the vendors to terminate the agreements if the Proposed Special Injunction Order is entered.

14. If the proposed Special Injunction Order is entered, the marketplace perception of Paramount’s strength and stability would be undermined, thus destroying Paramount’s perception and standing in the market. It is nearly impossible to quantify the loss of reputation that Paramount faces if the Proposed Special Injunction Order is entered.

15. Subjecting Paramount’s business decisions to supervision and approval by the Court would result in crippling inefficiencies.

16. The most likely outcome of the entry of the Proposed Special Injunction Order will be fewer ATMs available to the public.

17. Plaintiffs rely on the Affidavit of David Zook. I have reviewed the Zook Affidavit.

18. The Zook Affidavit relies on statements by Jorge Fernandez. Mr. Fernandez is a former Paramount employee.

19. Cash Connect has not discontinued services for the Paramount-managed ATMs.

20. Paramount-managed ATMs in Puerto Rico have not been going out of service due to non-payment to 3<sup>rd</sup> party vendors.

21. Paramount continues to operate the ATMs, they are being regularly serviced, and the ATMs continue to generate revenue. Paramount is paying its vendors and retaining the net revenues.

22. Paramount and the Funds (through PIG and the Managers) understood that Paramount would pay the monthly payment requirements quarterly rather than monthly and that Paramount would forgo certain payments in order to build a capital expenditure reserve in light of certain regulatory changes relating to TR-31 compliance that will become effective at the beginning of 2025 and that will require increased capital reserves associated with the ATMs.

23.

On August 19, 2024, Paramount, through counsel, notified the Terminated Funds by two letters that Paramount was terminating each of the MSAs with the Funds. In doing so, Paramount notified the Terminated Funds that it was exercising its right under Section 5(c) and Section 5(e) of the MSAs for the Terminated Funds to terminate the MSAs and buy out the

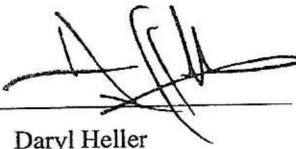
24. Paramount is ready and willing to close on a transaction to buy out the ATMs.

25. Paramount is ready and willing to participate in the appraisal process contemplated by the MSAs.

26. Rather than allowing Paramount to effectuate the termination of the MSAs and buy out certain of the ATMs, the Funds, including the Terminated Funds, in turn rejected Paramount's notice, demanded payment in contravention of the parties' agreements and amendment to those agreements, and brought this action against Paramount.

27. To date, the Terminated Funds have not engaged in any of the contractually required process to effectuate the buy out of the ATMs pursuant to Section 5(c) and Section 5(e) of the MSAs.

Executed this 25th day of August, 2024

  
\_\_\_\_\_  
Daryl Heller

# **EXHIBIT E**

**IN THE COURT OF COMMON PLEAS OF LANCASTER COUNTY, PA  
CIVIL ACTION-LAW**

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PRESTIGE FUND A, LLC, ET AL.,	:	
Plaintiffs,	:	No. CI-24-06012
v.	:	
	:	Hon. Leonard G. Brown,
	:	III
PARAMOUNT MANAGEMENT	:	
GROUP, LLC,	:	
Defendant.	:	
	:	

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**DENNIS REAM'S RESPONSES TO PLAINTIFFS' DEPOSITION**

**QUESTIONS FOR DENNIS REAM**

1. Identify and produce any documents you relied on in  
answering these questions.

**ANSWER:**

**See documents produced previously in response to subpoena.**

2. Describe your title, job description, responsibilities, and length  
of employment with Paramount Management Group, LLC.

**ANSWER:**

I was hired as CFO in October 2016 and served as day-to-day financial operations lead which included responsibilities such as building teams, systems integration, financial reporting and cost savings. In 2019, I was promoted to COO and expanded Paramount's operations teams to vertically integrate a few of its critical services that it was historically outsourcing. This included activities such as building teams, operational database developments, customer service call center, vault cash logistics and technical operations. In early January 2022, I resigned to pursue a different opportunity. I returned at the end of 2022 when I was hired to temporarily serve as CFO for 12-18 months in efforts to build teams both at Paramount and PowerCoin. Following this temporary period, I was to move into another leadership role within a Heller Capital portfolio company.

On August 29, 2024, I resigned from my employment with Paramount effective August 30, 2024. I officially separated from Paramount on October 7, 2024.



3. If there were any gaps in your employment with Paramount, why?

**ANSWER:**

Yes, as noted above, I resigned in early January 2022 to pursue a different opportunity in a new industry. At the time, my father's health was declining and this new opportunity offered me a chance to be closer in proximity to him and my mother. My father ultimately passed away in the summer of 2022 and a few months later I began having casual conversations about returning to a Heller Capital company. I ultimately returned at the end of 2022 as noted above.

4. To whom did you report at Paramount?

**ANSWER:**

**Randall Leaman, CEO**

5. What was total compensation, by year, at Paramount each year you were employed there?

**ANSWER:**

**CONFIDENTIAL**

**Total Compensation (including bonus):**

2016 - \$ [REDACTED]

2017 - \$ [REDACTED]

2018 - \$ [REDACTED]

2019 - \$ [REDACTED]

2020 - \$ [REDACTED]

2021 - \$ [REDACTED]

2022 - \$ [REDACTED]

2023 - \$ [REDACTED]

2024 - [REDACTED]

6. Did you receive any bonuses on top of your annual salary during each year of employment? If so, what was the amount of those bonuses? How were the bonuses calculated?

**ANSWER:**

**Yes, annual incentive bonuses were calculated based on different factors in different years. They were primarily based on a combination of meeting ATM operating gross profit/net operating income budget targets along with a few individual objectives/deliverables. The bonus program was consistent with executive and senior leadership team members.**

**Additionally, all Heller Capital companies, had a quarterly '3 for 3' bonus program. An employee was paid on each of the 3 objectives he/she successfully achieves during the quarter. The objectives are determined by the manager and paid based on the level of employee (\$250, \$350, \$450, \$600 per objective).**

**CONFIDENTIAL**

**Incentive Bonuses:**

**2016 - \$█**

**2017 - I do not recall.**

**2018 - I do not recall.**

**2019 - I do not recall.**

**2020 - \$█**

**2021 - \$█, █ (included in 2021 total compensation)**

**2022 - \$█, █ (included in 2023 total compensation)**

**2023 - \$█, █ (included in 2024 total compensation)**

7. What financial institutions has Paramount used since January 1, 2020?

**ANSWER:**

**First National Bank / M&T (Sharenet – rolls into Paramount)**

Sharenet was an acquired company and is a separate entity that was 100% owned by Paramount. It kept its operations separate and used M&T as it's bank.

8. How many accounts did Paramount have at each financial institution it used?

**ANSWER:**

**First National Bank: 4-5 / M&T: 2-4**

9. Which of the previously identified Paramount accounts are still active?

**ANSWER:**

**I'm not certain as I haven't been an active employee.**

10. Did Paramount own any vehicles over the last five years? If so, describe each. If any have been sold, describe which ones and when they were sold.

**ANSWER:**

**There were numerous vehicles over the years that were bought/traded in.**

**I can only recall a Cadillac, Ferrari, Porsche, Audi, Mercedes and  
Chevrolet.**

11. Did Paramount own any aircrafts over the last five years? If so, describe each. If any have been sold, describe which ones and when they were sold.

**ANSWER:**

**Not that I'm aware of.**

12. Did Paramount own any real property over the last five years? If so, describe that real property. If any real property has been sold, describe it and when it was sold.

**ANSWER:**

**Not that I'm aware of.**

13. What accounts receivable, if any, does Paramount currently have?

**ANSWER:**

**I'm not certain as I haven't been an active employee however Paramount has not historically maintained much trade A/R.**

14. What distributions did you receive from Paramount from January 1, 2024 to the present?

**ANSWER:**

**None.**

15. What is the current net value of Paramount's assets?

**ANSWER:**

**I do not know the current net value of Paramount's assets.**

16. What are Paramount's assets that support your valuation of Paramount's net value of assets in the preceding question?

**ANSWER:**

**Not applicable.**

17. Are there any other assets Paramount has/had that you have not already listed?

**ANSWER:**

**Warehouse of ATM's and Intercompany Balances Due from Heller Capital, PowerCoin along with a "RAW Receivable."**

18. Did Paramount have any assets that it sold between January 1, 2024 and December 31, 2024?

**ANSWER:**

**I'm aware of the sale of the Cypress and PCI portfolios however I did not see any of the documents and wasn't involved in the sale.**

19. What was the value of Paramount's net assets each year from 2021 to the present?

**ANSWER:**

**I am not in possession of documents or records sufficient to respond to this question. Based on my recollection from when I was still employed by Paramount I would estimate approximately \$80-100 million in 2024.**

20. How much cash did Paramount have on hand on January 1, 2024?

**ANSWER:**

**I do not recall and I am not in possession of documents or records sufficient to respond.**

21. How much cash did Paramount have on hand on November 21, 2024?

**ANSWER:**

**As set forth previously, I was fully separated from Paramount at this time and do not know what cash Paramount had on hand on November 21, 2024. Immediately prior to my resignation, Paramount had minimal cash on hand.**

22. How much cash did Paramount have on hand on December 31, 2024?



**ANSWER:**

**As set forth previously, I was fully separated from Paramount at this time and do not know what cash Paramount had on hand on December 31, 2024. Immediately prior to my resignation, Paramount had minimal cash on hand.**

23. Into what accounts did Paramount deposit the money it received from the Funds between 2017 and 2024 to purchase ATMs?

**ANSWER:**

**First National Bank**

24. Did Paramount transfer money to Heller Capital between January 1, 2017 and the present? If so, how much? If so, when?

**ANSWER:**

**Yes, there were many transfers over the years, however, I do not recall the dates and amounts of the transfers. The transfers were not for a consistent amount. I generally recall them being in the thousands (some, \$100K+).**

25. Did Paramount transfer money to PowerCoin between January 1, 2024 and the present? If so, how much? If so, when?

**ANSWER:**

**Yes, there were transfers, however, I do not recall the dates and amounts of the transfers.**

26. What was Paramount's net profit each year from 2017 through 2024?

**ANSWER:**

**The files I previously produced for 2020 and 2021 show net profit (net operating income), however, I'm not certain if those were 'final' numbers or not. If so, NOI for 2020 was about \$2.5M and 2021 was about \$4.0M. I believe Paramount finished 2023 with approximately \$6M in NOI based on my recollection but cannot confirm without access to the records.**

27. What was your analysis of Paramount's profitability and financial strength in 2021?

**ANSWER:**

**My recollection was that Paramount improved top line and bottom line each year. I do not recall specifics for each year but know Paramount struggled through 2020 with COVID. Lower interest rates on cash helped margins during this period of 2020-2021 and Paramount remained profitable.**

28. What was your analysis of Paramount's profitability and financial strength in 2022?

**ANSWER:**

**I was not with Paramount for most of 2022. I believe Paramount remained profitable but its margins began to shrink as interest rates began to increase in 2022.**

29. What was your analysis of Paramount's profitability and financial strength in 2023?

**ANSWER:**

**I believe Paramount remained profitable but its margins began to shrink as interest rates began to increase in 2022. Based on my recollection, Paramount did approximately \$6M in EBITDA.**

30. What was your analysis of Paramount's profitability and financial strength in 2024?

**ANSWER:**

**Based on my recollection, Paramount started the year off well in 2024. Its financial strength began to decline during the 2<sup>nd</sup> quarter as operating cash was being pulled by Daryl Heller. This resulted in many challenges with vendors and customers where Paramount began losing both.**

31. What did you base your profitability analysis on?

**ANSWER:**

**ATM Operations (Surcharge, Interchange, Service, etc. Revenue less Cost of Goods Sold (COGS) and Selling, General, and Administrative expenses (SG&A)).**

32. Who are Paramount's current corporate officers and who were Paramount's corporate officers as of January 1, 2024, September 1, 2024, and January 1, 2025?

**ANSWER:**

**Current - I do not know.**

**January 1, 2025 - I do not know.**

**September 1, 2024 - Daryl Heller (Chairman), Randall Leaman (CEO), Steve Gernes (President), and Derek Muhney (CRO). As noted previously, I had submitted my resignation as CFO effective by the end of August 2024 but I do not know when that change was implemented by the corporation.**

**January 1, 2024 - Daryl Heller (Chairman), Randall Leaman (CEO), Steve Gernes (President), Dennis Ream (CFO).**

33. What was Daryl Heller's role in Paramount?

**ANSWER:**

**Chairman (most recently at the time of my separation from Paramount); Daryl was very involved with day-to-day with Paramount. He interacted with numerous individuals/departments within the company routinely.**

**Among others, he made all financial decisions, critical organizational decisions, directed financial transactions and relationships, approved and closed acquisitions, and served as Paramount's leader.**

34. Are you familiar with Daryl Heller's expenses reimbursed through Paramount?

**ANSWER:**

**I'm not familiar and do not recall anything from Heller Capital or Daryl Heller seeking reimbursement for expenses.**

35. What kinds of expenses did you regularly submit for reimbursement through Paramount?

**ANSWER:**

**Primarily airfare, hotel, taxi, travel meals, and meals involving routine 1:1's with direct employees or team members.**

36. When you or Daryl Heller conducted business over meals at restaurants, including 401 Prime, were those reimbursed by Paramount? If not, who/what entity reimbursed for those meals?

**ANSWER:**

**If I hosted a 1:1 for a Paramount employee, those expenses would be reimbursed by Paramount. If it was a PowerCoin employee, it would be reimbursed by PowerCoin. As mentioned, I'm not familiar with Daryl Hellers reimbursements but he would typically pay the restaurant bill or Randall Leaman as the more senior Paramount employee conducting Paramount business.**

37. What were the typical travel and entertainment expenses by Paramount?

**ANSWER:**

**Airfare, hotel, taxi, mileage, travel meals, staff meals by manager, and team meals by department head.**

38. Did travel and entertainment expenses by Paramount include adult entertainment? If so, do you have personal knowledge of those expenses?

**ANSWER:**

**Not that I'm aware of.**

39. Does Paramount have any current monthly cashflow? If so, from what sources?

**ANSWER:**

**I do not know as I am fully separated from Paramount.**

40. What is/was Paramount's relationship with PowerCoin?

**ANSWER:**

**PowerCoin was originally derived as an additional product/service offering to Paramount customers. It grew into its own separately functioning operation in approx. 2022 with its own management team. Paramount continued to offer some managed services and system support along with leadership from Daryl Heller.**



41. What is/was Paramount's relationship with Heller Capital?

**ANSWER:**

**Heller Capital was the parent company to Paramount providing managed services such as management support, behavioral and organizational development, strategic planning, systems, human resources, payroll, benefits, project management and leadership from Daryl Heller.**

42. Did you hold any permanent or temporary roles with PowerCoin? If so, what role(s)?

**ANSWER:**

**CFO/COO during the start-up phases of 2020-2021 when both Paramount and PowerCoin were operating simultaneously with all resources; I was temporary CFO when returning at the end of 2022 as support to the existing Executive Vice President, Finance. I served as President for 9 months between August '23 and April '24 where my main role was building finance team and certain operations teams.**

43. Acting in your roles with PowerCoin, were you aware of compliance alerts regarding usage of BTMs by flagged parties?

**ANSWER:**

**I'm generally aware that there were compliance concerns but Paramount had a Chief Compliance Officer who reported to the CEO and I was not involved directly with compliance issues.**

44. Did Daryl Heller pull daily sums from PowerCoin; if so, how much?

**ANSWER:**

**I'm aware that there were daily amounts being pulled by a third party at the direction of Daryl Heller but not exactly sure of the details, how much or for how long.**

45. Was PowerCoin's lender Chicago Atlantic aware of Daryl Heller pulling daily funds from PowerCoin?

**ANSWER:**

**I do not know.**

46. Do you know where the daily withdrawals that Daryl pulled from PowerCoin were going? If so, where?

**ANSWER:**

Daily withdrawals were going to a third party but I do not recall the entity that was receiving them.

47. What was the “Tiger Team” as it related to PowerCoin?

**ANSWER:**

Tiger Team was a term coined for PowerCoin’s internal management of cash pickups and deposits. PowerCoin used third party resources along with key company personnel to provide quicker pickups of BTM cash that shortened the length of time between pickup and deposit to bank. Ultimately providing a shorter length of time to access the cash needed to keep up with operations.

48. Why didn’t PowerCoin engage a standard company to perform private pickup of cash in BTMs? Was it to avoid recordkeeping?

**ANSWER:**

PowerCoin did have standard companies such as Brinks and Loomis to provide pickups in addition to third parties and key company personnel. PowerCoin internal management provided additional checks and

**balances to improve the recordkeeping that is traditionally provided by its vendors and processing systems.**

49. Did you hold any roles with Powerquest? If so, what role(s)?

**ANSWER:**

**Not directly; PowerQuest was an entity created to satisfy compliance requirements in operating ATM's in dispensaries. It's overall operations and management rolled into Paramount although it was separate entity.**

50. Did Paramount ever issue payments to PowerQuest?

**ANSWER:**

**Not that I'm aware of.**

51. Are you familiar with a May 3, 2024 Authorization Agreement for Automated Clearing House Transactions under which Paramount authorized Reliance Financial to present automated clearing house debits to a First National Bank of Pennsylvania Account? If so, what was the purpose of this agreement and did you know about it when it was signed?

**ANSWER:**

**No, I am not familiar with the aforementioned Authorization Agreement.**

52. Did you hold any roles with Heller Capital? If so, what role(s)?

**ANSWER:**

**I did not hold any roles with Heller Capital.**

53. Did Paramount ever issue payments to Heller Capital?

**ANSWER:**

**Yes, there were monthly management fees invoices and general direction to send payments by Daryl Heller.**

54. How much money did Paramount pay Heller Capital each month?

**ANSWER:**

**The monthly management fee, I believe, was ~\$12K per month. Other payments directed by Daryl Heller were for varying amounts. Other payments I can recall would be in a \$100K-\$400K range.**

55. What was the purpose of those payments?

**ANSWER:**

**Management fee was to cover the managed services they provided; I don't believe Paramount received a purpose for other payments directed by Daryl Heller.**

56. Did Paramount issue payments to PowerCoin?

**ANSWER:**

**Yes.**

57. How much money did Paramount pay to PowerCoin each month?

**ANSWER:**

**I don't believe there were monthly payments, rather, payments were directed by Daryl Heller.**

58. What was the purpose of those payments to PowerCoin?

**ANSWER:**

**I believe to cover immediate operating cash needs.**

59. Is Bitstop still in operation? If so, where does the money Bitstop flow to?

**ANSWER:**

**I'm not certain if they are still in operation but I would assume so.**

**Bitstop is a separately owned entity that operated as a vendor/service provider to PowerCoin. I believe Bitstop took a percentage of the BTM transaction for their services.**

60. Was Paramount ever purchasing bitcoin monthly?

**ANSWER:**

**Not that I recall; a separate entity, PowerCoin, was established for compliance reasons.**

61. If Paramount was purchasing Bitcoin monthly, when and for how long? Where is that Bitcoin now?

**ANSWER:**

**I am not aware of Paramount purchasing Bitcoin monthly.**

62. Did Paramount have anyone receiving money on payroll who was not performing work for Paramount? If so, did they include any relatives, spouses, or paramours of Daryl Heller?

**ANSWER:**

**Not that I'm aware of.**

63. Did any non-Paramount employees, including relatives, spouses, or paramours of Daryl Heller, benefit from Paramount meals, entertainment, or travel?

**ANSWER:**

**Not that I'm aware of.**

64. Was Barry Reyerson the CFO of Heller Capital Group, LLC at any time in the last five years?

**ANSWER:**

**Yes, I believe he was the CFO for the past 6 years before resigning in 2024.**



65. Did Barry Reyerson have any access to Paramount? If not, why not?

**ANSWER:**

**I'm not familiar with what access, if any, he had to Paramount.**

66. Did Paramount and its principals, agents, or employees ever use private planes owned by Heller Capital?

**ANSWER:**

**Yes.**

67. Are you aware of flights on Heller Capital private planes transporting large amounts of cash to Michigan? If so, were you ever on those flights?

**ANSWER:**

**Yes; Yes, this was related to PowerCoin (not Paramount) and I was on two flights.**

68. If you are aware of flights on Heller Capital private planes transporting large amounts of cash to Michigan, what bank received that cash? Were reports filed with bank regulators for these cash deposits?

**ANSWER:**

**The receiving bank was Citizen State Bank. I do not know if reports were filed.**

69. Who on your team was engaged with and handled the ATM investment dollars?

**ANSWER:**

**Primarily the accounting department would handle/record deposits and payments at the direction of Daryl Heller. I believe this would include the VP, Finance and Accounting, Controller, Accountant and Accounts Payable roles.**

70. Were you involved with the purchase of ATMs from TriData? If so, why were ATMs purchased from TriData left in storage rather than put into service?

**ANSWER:**

**No, Daryl Heller had the relationship with TriData and the purchases.**

71. What was the purpose of negotiating storage for the ATMs purchased from TriData?

**ANSWER:**

**I do not know.**

72. Did Paramount ever intend to put any of the TriData purchased ATMs into service?

**ANSWER:**

**I would assume so but not certain of Daryl Heller's arrangement with TriData.**

73. What position did Brandon Hall play at Paramount and what were his responsibilities?

**ANSWER:**

**Brandon Hall was Vice President, Finance and Accounting. He joined when I returned at the end of 2022 to handle the day to day Financial**

**Planning & Analysis and accounting functions at Paramount. He helped build/oversee the teams and served in a leadership role while I spent a significant amount of time at PowerCoin.**

74. Why did Daryl Heller handle all communications with Prestige instead of you, the Paramount CFO?

**ANSWER:**

**As noted, Daryl Heller was very involved with Paramount and it was his role to manage Prestige and other funds. The teams and I took direction from him with every aspect. His role, the processes and procedures began many years before I arrived at Paramount and he maintained that role from the beginning to the end of my tenure with Paramount. My role did not include any fund management and I had very little communication with Prestige or other entities.**

75. As of the date of your response to this question, what is the total amount of cash in all financial accounts that are accessible to Paramount or any entity owned or controlled, directly or indirectly by Paramount?

**ANSWER:**

**As set forth previously, I am fully separated from Paramount and do not know how much cash, if any, is in Paramount's financial accounts.**

76. What was the relationship between Paramount and the Prestige Investment Group?

**ANSWER:**

**Prestige, through Daryl Heller, provided funds when needed for acquisitions, inventory purchases and other capital projects.**

77. What was the value of the Prestige Investment Group's relationship with Paramount?

**ANSWER:**

**Helped fund growth both inorganically and organically.**

78. What were Paramount's routine expenses, including operating costs, rental costs, payroll and benefits, mortgage payments, etc., each year from 2017 to the present?

**ANSWER:**

**I do not know specific amounts, but they generally included:**

**Merchant Payments**

**Vault Cash, Armored Car and ATM Cash Management Fees**

**Process and Networking Fees**

**Cash Insurance**

**Maintenance Costs**

**Payroll and Benefits**

**Business Insurances**

**Marketing, Trade Shows and Travel**

**Office Expenses such as printers and supplies**

**Office and Warehouse Rental Fees**

**IT Expenses**

79. Does Paramount have any routine expenses currently? What are those expenses?

**ANSWER:**

**As set forth previously, I am fully separated from Paramount and do not know what routine expenses it currently has.**

80. Were you involved in the purchase of ATMs? If so, how?

**ANSWER:**

**I have been involved with a 'year-end' purchase which was simply getting the best rate from a supplier based on the forecasted amount of machines the sales team expected to organically deploy that year.**

**However, there are many times machines were purchased throughout the year as needed (model requirement, etc.) that I was not involved with.**

81. Where you involved in the purchase of ATMs for the Funds? If so, what was your role?

**ANSWER:**

**No, I was only involved with the purchase of machines for operational purposes.**

82. Did you see bills of sale provided to the Funds for ATMs purchased?

**ANSWER:**

**I have seen these in the past.**

83. Are you familiar with Paramount's profit and loss statements?

**ANSWER:**

**Yes but as noted previously, I am now fully separated from Paramount and would not be familiar with statements following my separation.**

84. Were you involved in preparing those?

**ANSWER:**

**I was mainly involved with a monthly review but have not specifically prepared them.**

85. Did Paramount's profit and loss statements show "ATM sales"?

If so, what was your understanding of that line item?

**ANSWER:**

**Yes, my understanding of ATM Sales is that Daryl Heller was selling an ATM to Prestige, or another entity, and when he issued a bill of sale, Paramount recognized the revenue.**



86. Did Paramount's profit and loss statements show "PE Payments"? If so, what was your understanding of that line item?

**ANSWER:**

**Yes, my understanding is that for the purchase of an ATM, Daryl had an arrangement that involved a fixed monthly expense that got paid back to Prestige, or another entity.**

87. Did you ever independently verify sources of income for Paramount?

**ANSWER:**

**Not independently but the accounting and operations teams verified routine sources of income that were "operational" (surcharge income, interchange income, service income, etc.).**

88. Did you ever have communication on behalf of Paramount with Pathward? If so, describe those communications.

**ANSWER:**

**I don't believe I'm familiar with Pathward and do not recall communicating with Pathward on behalf of Paramount.**

89. Did you ever have communication with Urish, Popeck Accountants and Consultants? If so, describe those communications.

**ANSWER:**

**Yes, they served as advisors to Paramount and its affiliates. I have communicated with them regarding annual tax returns and/or general tax matters for Paramount, Sharenet, First Regents and PowerQwest. I'm aware that they complete the PowerCoin annual audit and tax return but I have not been a part of that communication for many years. They are also my personal accountants.**

90. Did you send a letter dated December 13, 2023 to Zulfe Ali at Velerity Group, Inc.?

**ANSWER:**

**I do not presently recall writing a letter to Zulfe Ali at Velerity Group, Inc.**

91. As stated in the December 13, 2023 letter from you to Zulfe Ali at Velerity Group, Inc., what materials did you review to confirm the operational revenue generated by the ATMs?

**ANSWER:**

**I do not presently recall writing a letter to Zulfe Ali at Valerity Group, Inc.**

92. Per that same letter, why did you believe operational revenue was “adequate to consistently support the preferred monthly distribution to Prestige Funds based on income generated by the ATMs”?

**ANSWER:**

**I do not presently recall writing a letter to Zulfe Ali at Valerity Group, Inc.**

93. In assessing the operational revenue, were you relying solely on income generated by the ATMs or were you also relying on new investments from the Funds?

**ANSWER:**

**I do not presently recall writing a letter to Zulfe Ali at Valerity Group, Inc.**

94. Who would have a complete set of Paramount's financial books and records, including P&Ls and General Ledgers, from 2017 through 2024?

**ANSWER:**

**At the time of my separation from Paramount, these documents were maintained on the Paramount server, and I assume Daryl Heller would have them as well.**

95. What assets of Paramount, of any kind, do you believe presently exist and where? Include in your answer financial assets, physical assets, and any cryptocurrency assets.

**ANSWER:**

**I would assume there are a large number of physical ATM's (at one point in the Pitney Road warehouse), physical BTM's (I believe Paramount was supposed to own ~150-200 machines only), merchant**

**contracts/settlements (whatever is remaining due to business decline),  
intercompany receivables, and RAW receivable.**

96. Why was Paramount unable to make the monthly payments to the Funds in 2024?

**ANSWER:**

**I do not know. Paramount took direction from Daryl Heller on monthly payments and he assured the company that payments would occur.**

97. Where did the money to fund the monthly payments go?

**ANSWER:**

**I do not know. As mentioned previously, I was not involved with the funds and when any money was coming into Paramount or how it went out to the funds.**

98. Was Paramount ever profitable solely through the operation of ATMs? If so, which years?

**ANSWER:**

**Yes, Paramount was profitable through ATM operations for many years but without access to Paramount's records I do not specifically recall which years.**

99. Did Paramount fund monthly payments to the Funds through new investments by the Funds in Paramount?

**ANSWER:**

**I do not know. The payments between Paramount and Prestige were run separately between Daryl Heller and Prestige.**

100. Was Paramount operating a Ponzi scheme?

**ANSWER:**

**Not that I was aware of. Daryl Heller consistently and vocally represented to management that the ATM program with Prestige (and a few other entities) was legitimate and had approval from the SEC or SEC attorneys, and I believe he indicated that it had passed an audit.**

101. Identify all persons you believe may have information on where Paramount assets may be found. Describe what information you believe each person identified may have.

**ANSWER:**

**See all previously mentioned people and entities in these responses.**

**Daryl Heller would be the primary person with this information.**

McQUAIDE BLASKO, INC.

Dated: March 24, 2025

By: 

Philip K. Miles, Esquire

Pa. ID. No. 209425

[pkmiles@mqblaw.com](mailto:pkmiles@mqblaw.com)

811 University Drive

State College, PA 16801

(814) 235-2222

Attorneys for Dennis Ream

**VERIFICATION**

The undersigned verifies that he is authorized to make this Verification on his own behalf that the responses made in the foregoing Deposition Questions to Dennis Ream are true and correct to the best of his knowledge, information and belief. The undersigned understand that false statements herein are subject to the penalties of 18 Pa. C.S.A. § 4904, related to unsworn falsification to authority.

A handwritten signature in black ink, appearing to read "D Ream", written over a horizontal line.

Dennis Ream

Dated: March 24, 2025



# **EXHIBIT F**

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

3/13/24 11:51:41 AM EDT

+17176291559

Liked "ok to sign: Asset Purchase Agreement for ATMs\_PFAI..."

3/13/24 11:52:28 AM EDT

+17176291559

➔ Replying to you, 2024-02-26 08:04:37: « good morning Daryl and Happy Birthday. I hope you have a great day and know that you are loved. My fam... »

Apologies I missed this message. Thank you for the very kind and considerate message!

3/13/24 11:52:40 AM EDT

➔ Replying to you, 2024-02-26 08:04:37: « good morning Daryl and Happy Birthday. I hope you have a great day and know that you are loved. My fam... »

Loved "Apologies I missed this message. Thank you for the..."

3/30/24 11:33:35 AM EDT

+17176291559

I just realized I missed your birthday! So sorry. Appreciate you, respect you, and wish you best year of your life!

3/30/24 11:39:06 AM EDT

No problem, thank you!

4/5/24 11:27:20 AM EDT

don't know if you saw my email about communicating to customer service but would like something from you that I can forward to them regarding the incident this morning with the investor.

4/5/24 11:31:01 AM EDT

please 😊

4/5/24 11:47:31 AM EDT

got emails. Thanks!

4/5/24 9:19:43 PM EDT

Just sent to your email

4/7/24 6:58:53 PM EDT

Last minute I know — Cheri and I are sitting by the fire. You and Char are welcome to join us. Having wine and cigars. No pressure to say yes.

4/7/24 6:59:06 PM EDT

No need to talk shop.

4/7/24 7:47:30 PM EDT

+17176291559

Very kind of you. I left for New York to try to close this 80m deal

4/7/24 7:48:04 PM EDT

No worries at all good luck on the deal. We'll catch up again sometime

4/7/24 8:56:09 PM EDT

+17176291559

Loved "No worries at all good luck on the deal. We'll cat..."

4/10/24 8:33:20 AM EDT

are we still on for 1:1 and performance review at 9 am?

4/10/24 8:33:28 AM EDT

if so where would you like to meet?

4/10/24 8:34:03 AM EDT

I'm ok deferring too if that works better in your schedule

4/11/24 11:16:59 AM EDT

good morning Daryl — I need you to weigh in bonus payouts for 2023 so we can have pay/performance reviews with SLT. When are you available for a 30 minute call to review? This is primarily for Dennis, Steve and me but other SLT members are also dependent on your decision as to how we are paying or not for NOI.

4/11/24 11:29:15 AM EDT

+17176291559

Yes, tied up in meetings for a few hours. Could you email or text me your recommendation?

Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.net, +17179175670, randall.leanman@paramountmgt.com, +17179172753

4/11/24 11:29:24 AM EDT

sure

4/11/24 12:13:39 PM EDT

Randall Leanman		Potential Comp	% Achieved	Final Comp	Budget	Actual	Comments
Bonus Percent of Base Comp		\$ 330,000	40%	\$ 330,000			
Date							
Cash-Register Risk/cryptocurrency machine	1	6/1/23	\$ 13,200	0.0%	\$ -		Not achieved because Dave Charles program is failing
Implement interest rate actions to offset interest rate increase - 80%	2	7/1/23	\$ 13,200	68.0%	\$ 8,976	\$2,403M	Achieved by 12/31/23
Phonics GP improvement to \$400K	3	9/1/23	\$ 13,200	0.0%	\$ -		Not achieved but still implementing corrective actions
Additional acquisition to achieve targeted GP	4	10/1/23	\$ 13,200	49.0%	\$ 6,465	\$4.9M	
Customer service reorganization to improve service and reduce customer service labor by 50%	5	12/31/23	\$ 13,200	100.0%	\$ 13,200	\$ -	
NOI Meet or Exceed Budget	6	12/31/23	\$ 66,000	67.4%	\$ 44,466	\$ 8,250,267	Used company-wide for all other SLT leaders as well
Total Bonus		\$ 330,000		\$ 79,388			
Total		\$ 462,000		\$ 409,108			
Steve Gervais		Potential Comp	% Achieved	Final Comp	Budget	Actual	
\$ 257,500			40%	\$ 257,500			
Date							
Bonus Percent of Base Comp	1	6/1/23	\$ 10,300	100.0%	\$ 10,300		
18-22 Evaluation, Budget, High Level Action Plan Targets	2	6/30/23	\$ 10,300	50.0%	\$ 5,150		Started but not completed until Q3 2024
Accountant initiation process (5 days)	3	9/30/23	\$ 10,300	0.0%	\$ -		Started but won't be complete until Q2 2024
Regionalize parts so no high Priority ATMs down more than 12 hours for due to parts availability	4	9/30/23	\$ 10,300	100.0%	\$ 10,300		Not implemented. Chose to do a reorg instead
Regional/Portfolio Account Manager approach - implement 2	5	12/31/23	\$ 10,300	0.0%	\$ -		Not achieved
Savings with amended code of \$1934 GP	6	12/31/23	\$ 10,300	67.4%	\$ 6,947	\$ 8,250,267	Used company-wide for all other SLT leaders as well
Total Bonus		\$ 385,000		\$ 60,447			
Total		\$ 385,000		\$ 317,947			
Derrick Ream		Potential Comp	% Achieved	Final Comp	Budget	Actual	
\$ 202,583			40%	\$ 202,583			5 months at full comp for PMG, 7 months split with Margo
Date							
Bonus Percent of Base Comp	1	6/30/23	\$ 8,103	100.0%	\$ 8,103		
Reorganize and finalize finance and accounting team structure	2	6/30/23	\$ 8,103	100.0%	\$ 8,103		
Build finance business partner function (partner GP enhancement) establish targets	3	9/30/23	\$ 8,103	100.0%	\$ 8,103		
Develop acquisition team and finalize new procedures	4	9/30/23	\$ 8,103	50.0%	\$ 4,052		marketing materials not complete
Implement new standardized acquisition marketing materials, term sheet, and internal pitch decks	5	12/31/23	\$ 8,103	0.0%	\$ -		BP team found prospects exceeding this but not implemented
Drive \$50K of accumulated monthly gross profit run rate through finance business partner function	6	12/31/23	\$ 40,517	67.4%	\$ 27,287	\$ 8,250,267	Used company-wide for all other SLT leaders as well
Total Bonus		\$ 81,093		\$ 39,659			
Total		\$ 289,617		\$ 258,242			

4/11/24 12:14:54 PM EDT

please note that most of the bonus is driven by achieving NOI. This accounts for 50% of potential bonus earned. We only achieved 67% of our budgeted NOI for the year

4/11/24 12:15:40 PM EDT

I'm ok if you want to lower this further as a result of the large miss

4/11/24 12:51:49 PM EDT

Also David Dove is coming to Lancaster on morning of May 9. Do you want to meet with him?

4/12/24 8:31:40 AM EDT

good morning Daryl — hope you are feeling better. Just checking to see if you had a chance to digest the bonus doc I sent you here.

4/12/24 8:31:59 AM EDT

this is hold up performance and pay reviews for SLT

4/12/24 8:34:25 AM EDT

+17176291559

➔ Replying to you, 2024-04-11 12:51:49: « Also David Dove is coming to Lancaster on morning of May 9. Do you want to meet with him? »

Yes

4/12/24 8:34:40 AM EDT

ok. I will set up on Rose's calendar

4/12/24 8:34:48 AM EDT

with Rose to get on your calendar

4/12/24 8:35:00 AM EDT

+17176291559

➔ Replying to you, 2024-04-12 08:31:40: « good morning Daryl — hope you are feeling better. Just checking to see if you had a chance to digest... »

Can I get to you in a few hours or need now?

4/12/24 8:35:12 AM EDT

few hours is fine

4/12/24 8:35:20 AM EDT

if I have today sometime, we are good

4/12/24 8:38:39 AM EDT

by the way, I had Rose sign a doc for you earlier this week — Regarding Sharenet lawsuit, we are agreeing to keep the documents and information confidential.

4/12/24 8:39:55 AM EDT



doc02399920240410133711.pdf

4/12/24 5:50:15 PM EDT

+17176291559

Apologies for delay. So since we only achieve 67%, you're still paying 67% of the total variable amount for NOI?

4/12/24 5:52:03 PM EDT

That's what I was thinking, however I wasn't sure how you wanted to handle that

4/12/24 5:52:25 PM EDT

So it's 67% of the 50% of the bonus that could be earned

4/12/24 6:01:52 PM EDT

+17176291559

Consider these approved

4/12/24 6:02:51 PM EDT

+17176291559

In future years generally if we are below 80% of noi it should be zero. They can slide down to a reasonable number but when you miss at that level you can't pay 67% in the future so just make sure you communicate so we don't set a false precedence.

4/12/24 6:03:16 PM EDT

Understood

4/12/24 6:03:19 PM EDT

Thanks

4/12/24 6:05:00 PM EDT

Appreciate it!

4/16/24 11:27:05 AM EDT

are you available tomorrow late afternoon or early evening to talk about PMG cash? Partners and employees are aware and vendors are putting us on credit hold. Would like to understand what is happening and when we will be out of the woods here. Happy to meet anywhere that works for you.

4/16/24 1:23:38 PM EDT

+17176291559

Randall, I have failed you and I apologize. This recap was supposed to be in place already. We used way too much working capital for cryptocurrency and cannabis the past couple years. I will get you iodate later today/in morning.

I'm in New York, or I would meet tonight. I'm just finishing off this recap so we can get this challenge behind us and move into deleverage. Dave Zook is putting a lot of pressure on me and I'm just giving him high level Multiple contributing reasons as to why we can't pay this last fund. Obviously, many of these have been contributing reasons for a month, and I did not wanna provide any cryptocurrency or cannabis reference to him. I should have the first tranche of money coming tomorrow to close out the funds. Please don't take any calls from Dave until this is b hid us as I will handle.

4/16/24 1:46:33 PM EDT

Loved "Randall, I have failed you and I apologize. This r..."

4/17/24 4:03:38 PM EDT

when you have this resolved, will you please give me something I can release to the entire company about this. Everyone is aware of this as vendors are threatening to shut us off and I'm concerned about the lack of trust this will create if we don't address.

4/17/24 4:04:13 PM EDT

+17176291559

For sure! I can meet with them.

4/17/24 4:04:39 PM EDT

thinking if I just had an email from you that I could send to the Senior Leadership team that this would be enough.

4/17/24 4:04:50 PM EDT

thanks!

4/17/24 5:48:39 PM EDT

Dan Burkholder just called, said that Jerry Hostetter reached out to him and asked him if he could call me. I told Dan to tell Jerry to call you.

4/17/24 5:51:21 PM EDT

+17176291559

I will deal with Jerry when back. Just tell Dan to tell him that we are working to make the last payment and will send out a post Mortem next week. Not the person to talk to until this is closed out and the deleverage occurs.

4/17/24 5:51:48 PM EDT

OK. Are you OK? I'm hearing that you're in the hospital.

4/17/24 5:55:13 PM EDT

+17176291559

Yes, I'll be okay. Thx for asking.

4/17/24 8:26:10 PM EDT

**From Jerry**

Hi Randall,

This has been a very stressful last two weeks.

I am asking you to pls keep this text between us.

Daryl wants to be the point which I appreciate. But what is happening is affecting me and you.

If you want to talk I'm open. If not, i completely understand.

Outside of Daryl I am the lead at Prestige and you are the lead at PMG.

I am still in CA and on west coast time if you want to talk.

Thanks

4/17/24 8:29:34 PM EDT

I didn't respond to him



4/17/24 8:31:42 PM EDT

+17176291559

He's such a mess. I would either

1) ignore it

2) or respond that we're making final payment this week and will provide a formal legal postmortem in a week or so and all communication is being consolidated down to one person

The second response will have him follow up 10 times but I'll let it up to you

He has fear we're gonna deleverage and close all the funds, but friends and family

Thanks for keeping me posted. Please let me know how you decide to handle and any follow up.

4/17/24 8:32:14 PM EDT

I plan to ignore. I work for you.

4/17/24 8:32:31 PM EDT

+17176291559

Ty!

4/18/24 10:02:04 AM EDT

Ignoring this too

4/18/24 10:02:07 AM EDT

Do you have a few minutes to talk?

Dave Zook

4/18/24 12:34:05 PM EDT

Another one, ignoring this one as well

4/18/24 12:34:12 PM EDT

Hi Randall, it's Matt Eby from Prestige. I do sincerely apologize that I have to reach out to you in this fashion, but wanted to see if you have a few minutes to catch-up regarding some of our remaining outstanding payments. Thanks

4/18/24 1:02:33 PM EDT

+17176291559

I have advised legal will provide formal response after payment. Let Dennis and Brandon know as well. It will coincide with deleverage.

4/18/24 1:03:16 PM EDT

OK, I am driving on my way to Indianapolis. I'll get it to them when I am able.

4/18/24 5:26:39 PM EDT

Daryl, please see email looks like one of the investors reached out to Cash Connect and let them know that we're not paying them. This is really serious.

4/18/24 5:27:01 PM EDT

We owe Cash Connect for three months in arrears. They've been asking us to pay up.

4/18/24 5:36:56 PM EDT

This will give them more resolve to do so as we have \$100 million line of credit with them for our machines

4/18/24 5:38:17 PM EDT

+17176291559

It's 100% unacceptable. I'm sorry. I need to finish the funding and then the deleverage. I will personally meet with Cash Connect.

4/18/24 5:40:08 PM EDT

Ok

4/18/24 7:20:39 PM EDT

Sorry didn't mean to be abrupt. Had just saw my family in Indianapolis. Thanks for your help on this. We will get through this.

4/20/24 7:22:15 AM EDT

Good morning Daryl. We don't have enough cash in DHRL account to make beach house mortgage payment as this cash was used for Paramount. This payment is due end of month. What are your thoughts on what we should do here?

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

4/20/24 7:25:31 AM EDT

+17176291559

I will get it funded. I'll send update on Fundind on other group text. I funded prestige 2 million like yesterday so we only owe 400 K to them and we got 2 million into

4/20/24 7:25:55 AM EDT

Liked "I will get it funded. I'll send update on Fundind ..."

4/20/24 5:49:04 PM EDT

+17176291559

You back Monday or tuesday?

4/20/24 5:49:36 PM EDT

Monday evening. Driving back from Indiana's

4/20/24 5:49:44 PM EDT

Indianapolis

4/20/24 5:52:55 PM EDT

+17176291559

May move Monday meeting to tuesday when you're back. I'm in New York as well but can be back. I'll talk with Dan.

4/20/24 5:55:58 PM EDT

Ok. I'm planning to be back around 5 pm on Monday so I'm fine with with whatever

4/20/24 5:59:27 PM EDT

+17176291559

We should meet as PMG first, i feel. W dan

4/20/24 5:59:54 PM EDT

Ok. I'm fine with that.

4/21/24 7:40:27 AM EDT

Good morning Daryl. Thinking more about the cash challenges at Paramount. I think it is necessary that the PMG meeting be held Monday night to talk about this. We need face time with you to understand what is happening and how to communicate it and our plan for the future. Thanks

4/21/24 7:41:44 AM EDT

I will be back in the area around 4 pm.

4/21/24 10:08:12 PM EDT

+17176291559

I'm just getting back from Wake forest and will be working on a deleverage plan and talking with legal tomorrow morning as well. We definitely do not want to meet with Prestige until we have this plan fully developed. expect to see a plan tomorrow. I will be deferring prestige until we had this planned ready to be implemented

4/21/24 10:14:25 PM EDT

Liked "I'm just getting back from Wake forest and will be..."

4/21/24 10:16:03 PM EDT

+17176291559

Also, Dan had mentioned that I had communicated to you that I had cancer before my sabbatical. I clarified with him and want to make sure I clarify with you, as it sounds like we had a misunderstanding. Perhaps we had too many drinks that night :) What I stated was that I have significantly elevated PSA which had doctors concerned however needed biopsy to confirm but even if it is cancer, it'll be taken care of given caught early enough. I apologize if I somehow lead you to believe otherwise.

4/21/24 10:20:31 PM EDT

I told Dan that you had elevated levels. I did NOT say that you had cancer. I distinctly remember making that distinction. I told him that you didn't want me to say anything to anyone but given that you hadn't responded to Dan for a long time and that he feared you had a serious health issue, I wondered aloud is this could be the issue. So happy to talk further as we were all worried about you.

4/21/24 10:22:36 PM EDT

Thanks for clarifying and appreciate the communication.

4/21/24 10:22:38 PM EDT

+17176291559

Thanks for clarification, Randall. My biopsy is only occurring this week for that issue so will know shortly but given my PSA count has got checked every 8 -12 months the last few years given all my health issues so it would definitely be early phase.

4/21/24 10:23:13 PM EDT

Loved "Thanks for clarification, Randall. My biopsy is on..."

4/22/24 8:44:19 AM EDT

Good Morning Dary!! On my way back from Indy. Looks like I'll be back by about 4 pm. Are we getting together tonight? If so, where and what time?

4/22/24 9:35:58 AM EDT

+17176291559

Yes or teams call. 530?

4/22/24 9:36:23 AM EDT

Yes, that works for me

4/22/24 9:37:58 AM EDT

Will Dennis and Brandon be joining the call?

4/22/24 9:49:54 AM EDT

+17176291559

Yes

4/22/24 9:50:55 AM EDT

Cool

4/22/24 3:12:15 PM EDT

Should I also be inviting Dan Burkholder to this call tonight?

4/22/24 3:19:40 PM EDT

And is 30 minutes enough time?

4/22/24 3:19:42 PM EDT

+17176291559

Probably prefer six

I prefer that we put a plan together and then I present him and Barry as Barry is all over him and I wanna have ripcord plan developed fully. I talked to both today and Dan did not request such. Has he requested that of you? I told him I was meeting with you guys tonight and would provide something tomorrow.

4/22/24 3:19:57 PM EDT

+17176291559

No, need more than 30 minutes.

4/22/24 3:20:13 PM EDT

No, he did not request from me, but I wasn't sure what you were thinking so I wanted to be sure

4/22/24 3:20:32 PM EDT

Ok

4/22/24 3:20:48 PM EDT

+17176291559

Do you want me to send teams call or meet in person?

4/22/24 3:21:35 PM EDT

I can meet in person — not sure about Dennis and Brandon. I will check now.

4/22/24 3:21:52 PM EDT

I just got back from Indy

4/22/24 3:25:36 PM EDT

Dennis and I can meet in person at 6 pm. Brandon has a school board meeting tonight and cannot meet with us. Let us know where you want to meet.

4/22/24 3:43:44 PM EDT

+17176291559

I talked to Richard at 315pm and waiting for response on PPM so I know all my options. Hopefully he responds shortly which will allow us to meet at 6

4/22/24 3:44:07 PM EDT

Ok

4/22/24 4:14:00 PM EDT

+17176291559

He is reviewing recision options and should hear back shortly

4/22/24 4:14:18 PM EDT

Liked "He is reviewing recision options and should hear b..."

4/22/24 4:14:27 PM EDT

Who is Richard?

4/22/24 4:14:49 PM EDT

+17176291559

Regulatory counsel

4/22/24 4:14:54 PM EDT

Ahh

4/23/24 9:42:43 AM EDT

ok to sign: PFB Rd. 59 - APA.pdf, PFB Rd. 60 - APA.pdf, PFB Rd. 61 - APA.pdf, PFB Rd. 57 - APA.pdf, PFB Rd. 58 - APA.pdf

4/23/24 9:53:02 AM EDT

+17176291559

Yes

Year	Age	Investment	Investment	SPY % (Bul)
1999	18	100,000.00		1,000.00
1999	19	100,000.00		1,000.00
1999	20	100,000.00		1,000.00
1999	21	100,000.00		1,000.00
1999	22	100,000.00		1,000.00
1999	23	100,000.00		1,000.00
1999	24	100,000.00		1,000.00
1999	25	100,000.00		1,000.00
1999	26	100,000.00		1,000.00
1999	27	100,000.00		1,000.00
1999	28	100,000.00		1,000.00
1999	29	100,000.00		1,000.00
1999	30	100,000.00		1,000.00
1999	31	100,000.00		1,000.00
1999	32	100,000.00		1,000.00
1999	33	100,000.00		1,000.00
1999	34	100,000.00		1,000.00
1999	35	100,000.00		1,000.00
1999	36	100,000.00		1,000.00
1999	37	100,000.00		1,000.00
1999	38	100,000.00		1,000.00
1999	39	100,000.00		1,000.00
1999	40	100,000.00		1,000.00
1999	41	100,000.00		1,000.00
1999	42	100,000.00		1,000.00
1999	43	100,000.00		1,000.00
1999	44	100,000.00		1,000.00
1999	45	100,000.00		1,000.00
1999	46	100,000.00		1,000.00
1999	47	100,000.00		1,000.00
1999	48	100,000.00		1,000.00
1999	49	100,000.00		1,000.00
1999	50	100,000.00		1,000.00
1999	51	100,000.00		1,000.00
1999	52	100,000.00		1,000.00
1999	53	100,000.00		1,000.00
1999	54	100,000.00		1,000.00
1999	55	100,000.00		1,000.00
1999	56	100,000.00		1,000.00
1999	57	100,000.00		1,000.00
1999	58	100,000.00		1,000.00
1999	59	100,000.00		1,000.00
1999	60	100,000.00		1,000.00
1999	61	100,000.00		1,000.00
1999	62	100,000.00		1,000.00
1999	63	100,000.00		1,000.00
1999	64	100,000.00		1,000.00
1999	65	100,000.00		1,000.00
1999	66	100,000.00		1,000.00
1999	67	100,000.00		1,000.00
1999	68	100,000.00		1,000.00
1999	69	100,000.00		1,000.00
1999	70	100,000.00		1,000.00
1999	71	100,000.00		1,000.00
1999	72	100,000.00		1,000.00
1999	73	100,000.00		1,000.00
1999	74	100,000.00		1,000.00
1999	75	100,000.00		1,000.00
1999	76	100,000.00		1,000.00
1999	77	100,000.00		1,000.00
1999	78	100,000.00		1,000.00
1999	79	100,000.00		1,000.00
1999	80	100,000.00		1,000.00
1999	81	100,000.00		1,000.00
1999	82	100,000.00		1,000.00
1999	83	100,000.00		1,000.00
1999	84	100,000.00		1,000.00
1999				



4/25/24 8:03:53 AM EDT

Good morning Daryl, just a reminder to call Samantha Guthrie. She sent us wire instructions yesterday and wanted you to reach out to her as soon as possible.

4/25/24 8:04:22 AM EDT

She is not aware of any cash flow issues so just in case my message seemed like she was aware

4/25/24 9:38:30 AM EDT

also, any updates on cash coming in yet?

4/25/24 9:50:36 AM EDT

we have \$400k of merchant payments that we have not yet sent out, plus \$800k of A/P. I'm afraid we are going to lose significant business if we can't get out today or tomorrow.

4/25/24 9:51:08 AM EDT

sorry — \$675k of A/P

4/25/24 12:19:57 PM EDT

need time on Monday to review Certus deal please. They are requiring all offers by Tuesday next week.

4/25/24 3:04:45 PM EDT

Steve took this call

4/25/24 3:04:47 PM EDT

I just took a call from Dave Charles. Apparently one of our customers reached out to him, noting that they didn't get paid their commission and was curious about switching to him. I don't know any specifics, but thought I'd let you know.

4/25/24 3:05:09 PM EDT

we are having more and more customers threatening to leave us.

4/25/24 4:14:39 PM EDT

+17176291559

I had my procedure today, so just coming around. So the merchant payment is 400 K? I thought Brandon said on the call yesterday he had that set aside or was that the consulting partner agreement?

4/25/24 4:14:51 PM EDT

+17176291559

How many days later are the merchant payments?

4/25/24 4:15:56 PM EDT

Sorry. Forgot about your procedure. Hope everything went well Yes he is paying partners their commissions but this is customers that we have t paid yet

4/25/24 4:16:15 PM EDT

I don't know how late. I will ask

4/26/24 8:20:11 AM EDT

I said we are on for performance evaluation today. Does that still work for you?

4/26/24 8:20:20 AM EDT

If so, where do you wanna meet?

4/26/24 8:24:48 AM EDT

+17176291559

Given the absolute chaos and multiple calls I have coming up today. Do you mind pushing it back a week?

4/26/24 8:25:29 AM EDT

nope. I'm fine with that

4/26/24 8:26:28 AM EDT

+17176291559

Ty

4/26/24 10:05:06 AM EDT

We have a deadline of Tuesday to turn in an initial term sheet at Certus so they can evaluate as they have multiple offers. Are you interested in even entertaining this or not given all that's going on right now

4/26/24 1:24:29 PM EDT

+17176291559

I think worth putting in as it would be just a non binding offer. This would give time to play out liquidity. That assume you want to do deal. Could you review it today briefly, or send your recommendation to me and I can approve over text so we can atleast submit.

4/26/24 1:29:53 PM EDT

We are pulling everything together for you for a Monday review. I'll send it over to you Monday morning and maybe we can get on a call later Monday.

4/26/24 1:37:20 PM EDT

+17176291559

Liked "We are pulling everything together for you for a M..."

4/26/24 8:59:51 PM EDT

Randall,  
Can you pls tell me if your company that you are the CEO of can pay your bills?  
I don't care about what Daryl says anymore.'  
This has taken years off my life!  
I am a partner not an employee and I still haven't heard from Daryl if PMG will make payments Monday.  
I trusted you to make sure PMG was solvent.  
The last 5-6 weeks have killed me and all my faith in this company.  
I don't care if you share with Daryl or not.  
I need to prepare for what is happening.  
I'm tired of this!!

4/26/24 9:02:20 PM EDT

From Jerry

4/26/24 9:02:24 PM EDT

I am ignoring

4/26/24 9:16:46 PM EDT

More...

Is and was PMG a fraud??

4/26/24 9:51:09 PM EDT

+17176291559

Omfg. I'll hit him tomorrow. Messages him yesterday. This is all Self serving. No one wants to talk to him. Dan, Rick h, all tired of him.

4/26/24 9:51:35 PM EDT

Yep. I feel the same

4/28/24 11:00:58 PM EDT

+17176291559

I know TR 31 was delayed a bit but it's still on the requirement list, correct? I want to use it as part of the leverage.

4/28/24 11:01:32 PM EDT

Yes. We are working a three year plan on this.

4/28/24 11:01:39 PM EDT

Already in progress

4/28/24 11:01:49 PM EDT

+17176291559

Can you resend the spreadsheet staple together on all the units we need to address and cost

4/28/24 11:02:04 PM EDT

Yes. Give me a minute

4/28/24 11:02:36 PM EDT

+17176291559

is the mandate of January next year fully lifted or just communication likely see reprieve?

4/28/24 11:03:27 PM EDT

The requirement is still in effect but they are not going to enforce it. The way we expect this to impact us is that any fraud at a machine will be passed on to us.

4/28/24 11:03:50 PM EDT

Sort of like EMV

4/28/24 11:04:12 PM EDT

It was a requirement but they didn't shut off machines. They shifted fraud liability to us.

4/28/24 11:11:16 PM EDT

Do you need the plan tonight?

4/28/24 11:15:20 PM EDT

+17176291559

No I'm good

4/28/24 11:15:47 PM EDT

I have it but can't find it. We estimated about \$11-12M for total cost

4/28/24 11:16:12 PM EDT

+17176291559

We don't have to replace all the machines?

4/28/24 11:16:53 PM EDT

Correct. About a third need replaced, a third need upgraded parts and a third are ok

4/28/24 11:17:13 PM EDT

We have calculations on a spreadsheet that I can send you when I find it

4/28/24 11:18:58 PM EDT

+17176291559

Show ATMs that were manufactured in the last two or three years are OK?

4/28/24 11:19:11 PM EDT

Yes. I think so.

4/28/24 11:19:52 PM EDT

Some of them may require software upgrades but we can do those remotely

4/28/24 11:34:07 PM EDT

I requested most current spreadsheet calculations on this. I will send to you tomorrow morning

4/28/24 11:34:36 PM EDT

+17176291559

Ty

4/29/24 7:50:20 AM EDT

+17176291559

Do you have a link on TR 31 that I could use as an embedded link in my email. When I use that as a contributing reason to move to quarterly payments, and then will be used as a reason for record as well.

4/29/24 7:50:56 AM EDT

+17176291559

If you have multiple, it would be great to review so I can decide which one. Something that shows the severity of it in the risk of not doing it.

4/29/24 7:51:18 AM EDT

let me look. I can find pdfs more easily

4/29/24 7:52:13 AM EDT

none of what I have provides estimate of costs or impact.

4/29/24 7:54:32 AM EDT

+17176291559

Not looking for estimates are impact, just what it is, and why the change, and what the risk years of not being in compliance

4/29/24 7:55:04 AM EDT

i have emails on this. just sent one from Hyosung

4/29/24 7:56:37 AM EDT

just sent you two emails

4/29/24 8:05:56 AM EDT

<https://www.atmia.com/news/atm-security-through-cryptography-and-the-upcoming-tr-31-deadline/19276/>

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

4/29/24 8:07:21 AM EDT

<https://www.atmmarketplace.com/blogs/what-do-new-pci-mandates-mean-for-banks-atms/>

4/29/24 8:47:22 AM EDT

how much cash do you think Paramount will get today that we can use for operating needs? Thanks

4/29/24 10:01:23 AM EDT

+17176291559

Waiting on answers. Should know soon.

4/29/24 11:52:15 AM EDT

looks like we need at least \$2M to make it through the next couple of weeks

4/29/24 11:52:46 AM EDT

<b>Bank Balance:</b>	5,395,915	159,605	(142,186)	(347,688)	(542,188)	(1,364,688)	(1,588,262)	(1,368,411)	(5,791,243)	(1,718,743)
<b>Surcharge Revenue:</b>		98,500	100,000	100,000	117,000	432,500	95,500	97,000	100,000	117,000
<b>Other Inflow/Outflow:</b>	101,000									
<b>Routine Operating Outflows:</b>										
Payroll and EE Commissions				(254,700)						
Concur				(18,600)						
CC Print (Dennis' CC)										(100,000)
Chase CC Print (Randall's CC)										(17,199)
Rent and Location Payments - Check	-	-	-	-	-	(56,073)	(26,911)	(15,120)	-	(99,664)
Rent and Location Payments - ACH	(336,799)	-	-	-	(1,500,000)	-	(48,739)	(305,212)	-	(59,664)
Consulting Payments										
Merchant Bonus/Advance Check					(15,000)				(15,000)	
Merchant Bonus/Advance ACH					(15,000)				(15,000)	
Plan										
WFS/Cash Connect	(907,700)									
First Premier Bill										
Health Insurance		(214,200)								
Liability Insurance										
Misc.										
Unfunded CAPEX (AP)	(25,315)	(239,000)	(200,000)	(210,000)						
AP Ledger Payables	(1,147,310)	(400,293)	(300,000)	(310,000)	(1,530,000)	(96,073)	(75,600)	(320,332)	(30,000)	(176,863)
<b>Total Operating Outflows:</b>										
OS Checks	(570,211)	(550,211)	(534,211)	(505,211)	(484,211)	(245,211)	(311,284)	(338,196)	(363,316)	(353,516)
<b>Values (Dollars)</b>	(210,404)	(791,399)	(875,888)	(1,011,399)	(2,438,899)	(1,833,473)	(1,879,696)	(2,129,439)	(2,872,689)	(2,131,421)

4/29/24 11:56:39 AM EDT

Items in red are unmovable

4/29/24 12:25:26 PM EDT

+17176291559

Ouch as that does not include Cypress. Is there any flexibility to get some payment plans with Cash Connect? How about positive operating cash flow as I thought April is good month as well as May? Seems like we should be gaining cash flow. Let's hold back on advance/bonus for the next month as well

4/29/24 12:26:49 PM EDT

Cash connect was already paid today unfortunately. This does include \$300k of cypress this week but doesn't include all payables that are due.

4/29/24 12:29:48 PM EDT

It also doesn't include the acquisition that is waiting on us for \$680k and FNBs covenant call for \$885k or the final cord payment of \$224k. I assume Brandon's cash forecast shows increasing receipts for the time of the year but I will verify

4/29/24 12:49:56 PM EDT

including the balance of Cypress, i think we are in the \$5 to \$6M range for cash needed

4/29/24 12:50:01 PM EDT

maybe more

4/29/24 12:55:17 PM EDT

+17176291559

Can we do weekly cash review together to preserve cash until full recap.

4/29/24 12:57:05 PM EDT

yes. I can do that. I requested the above from Brandon for urgent items. we still have ATMs down in Puerto Rico and customers who haven't yet been paid.

4/29/24 1:02:33 PM EDT

also, tommy and joe from TNT are going ballistic as we haven't paid them for maintenance.

4/29/24 1:03:18 PM EDT

+17176291559

We must be bleeding cash from operations? Can we hold back on advances and bonuses and anything else for the next couple weeks.

4/29/24 1:17:48 PM EDT

we have been holding advances and bonuses for weeks now. Dennis says we are cash positive operationally and that he's been communicating with you about this for months now. Says our operating cash and LOC that we set up for operational timing issues has been pulled by you for various reasons. We are at the end of our rope here.



4/29/24 1:20:28 PM EDT

+17176291559

I'm not aware of the operating line being pulled. The only thing we did was pay back the 1 million that was loan from Libertas .

4/29/24 1:20:32 PM EDT

of the \$5 to \$6M that we are estimating \$3.5M is for Cypress, Bluevyne, FNB Covenant Breach, and Cord for hardware purchased at end of year

4/29/24 1:22:19 PM EDT

Dennis is saying we pulled \$1M for Libertas plus \$500k to use for working capital. Because we didn't show cash coming back, they are pulling the plug on the loan.

4/29/24 1:22:58 PM EDT

this \$500k was pushed to you and not used in operations

4/29/24 1:24:16 PM EDT

he says he and Brandon have been keeping you apprised of this all along

4/29/24 1:34:11 PM EDT

FNB is calling Dennis every day about this

4/29/24 1:34:31 PM EDT

Also, the \$\$ was used to fund Libertas debt payments on top of investors. Libertas hit us and we didn't get cash back. \$1M+

4/29/24 1:37:37 PM EDT

+17176291559

Is Brandon rejecting every single payment that comes him as he supposed to?

4/29/24 1:37:47 PM EDT

+17176291559

Do you have time to quickly review a correspondence?

4/29/24 1:39:01 PM EDT

I'd like to get Dennis on the call with us but I can do this. I have a call at 2 which I can push back.

4/29/24 1:39:15 PM EDT

Dennis is the one feeding me these details

4/29/24 1:40:17 PM EDT

i will check on brandon question — assuming this is for investors right?

4/29/24 1:42:54 PM EDT

yes, we are still rejecting auto debits

4/29/24 1:42:59 PM EDT

from investors

4/29/24 1:53:59 PM EDT

+17176291559

Can you join call

4/29/24 1:54:24 PM EDT

yes. do you want me to call yoy?

4/29/24 1:54:27 PM EDT

you?

4/29/24 3:02:55 PM EDT

you joining Certus call?

4/29/24 3:04:58 PM EDT

+17176291559

I am trying to get this distribution now. Is there anyway we could go more like five?

4/29/24 3:05:21 PM EDT

hmm...

4/29/24 3:05:54 PM EDT

yes. I can reschedule another meeting

4/29/24 3:07:52 PM EDT

will 5 work for you for sure?

4/29/24 3:09:36 PM EDT

i can reschedule

4/29/24 4:18:33 PM EDT

+17176291559

We have to respond back to them by Wednesday?

4/29/24 4:18:50 PM EDT

+17176291559

Is this just an internal call

4/29/24 4:19:02 PM EDT

+17176291559

I presume we could do it pretty quickly as we want to put a strawman and with no real commitment

4/29/24 4:19:08 PM EDT

Yes. Just internal call. We need to respond by end of day tomorrow.

4/29/24 4:19:21 PM EDT

Yes, agreed not even sure we want to do that. We will explain at 5 o'clock.

4/29/24 4:30:31 PM EDT

+17176291559

K. Let's make it quick.

4/29/24 4:30:41 PM EDT

OK, we can try getting on now if you're available

4/29/24 4:32:49 PM EDT

+17176291559

5 is better

4/29/24 4:34:57 PM EDT

Ok

4/30/24 12:32:43 PM EDT

+17176291559

Here is Attorney she wants us to talk to which is who did the sale with her.

4/30/24 12:32:49 PM EDT

+17176291559

Dave Ma | Partner

Jeffer Mangels Butler & Mitchell LLP | JMBM  
1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067

D: (310) 785-5379

DLM@JMBM.com

4/30/24 12:34:28 PM EDT

Ok. I will have Gierasch reach out to him

4/30/24 12:34:51 PM EDT

+17176291559

I have identified a hard money lender willing to lend me \$1,600,000 in time for me to close on 5/15 and for you to extend your payment to me until 5/31. Based on our previous communications, I propose the following:

- 1) Acceptance of your Personal Guarantee/PFS and copy of most recent Financials
- 2) 5/31 wire payment of \$400,000 compensation to accommodate the interest on the late payment, economic harm, increase funds in escrow, etc., plus the cost of the hard money loan (fees, interest, legal) of \$225,000.
- 3) \$1,650,000 to be wired on 5/31 to Cypress with any delayed payments of this or the funds above to be charged interest at 12.5%.
- 4) The \$2,500,000 payment per our APA due November 1 is to be adjusted be paid out at \$300,000 a month, beginning July 1, 2024, with the balance of \$1,300,000 due Nov 1. Late payments also calculated at 12.5% interest.
- 5) All attorney fees covered by PMG and this agreement executed by 5/2.

Your attorney should write this up and directly communicate with my attorney in an effort to expedite things.

4/30/24 12:35:07 PM EDT

+17176291559

I sent her my PFS so tell Steve to make a personal guarantee relatively late. She really wants us to execute something tomorrow.

4/30/24 12:35:46 PM EDT

Got it

4/30/24 1:00:22 PM EDT

our senior leadership team is here next week for our bi-annual leadership summit. Would you like to join us? Realize you are busy but your presence would be welcome for sure

4/30/24 4:52:33 PM EDT

Randall—I received your texts and understand that Daryl has renegotiated amounts owed to Cypress Advantage. Here's my understanding:

- Daryl provides a personal guaranty
  - The purchase agreement is amended to provide that:
    - The \$1,650,000 that was due April 28, 2024, is due May 31, 2024; if delinquent, accrues interest at 12.5% per annum
    - An additional \$400,000 would be paid May 31, 2024 in settlement of any past amounts owed
    - We will include a release of past breaches/claims to be effective upon the \$400,000 being paid
    - An additional \$225,000 payment will be made by PMG to Cypress to defray financing costs incurred by Cypress (that arise from our failure to timely pay)
    - \$2,500,000 owed November 1, 2024 would be paid
- \$300,000/month beginning July 1, 2024, with balance of \$1,300,000 due November 1, 2024; 12.5% interest to accrue on any delinquent amounts owed

4/30/24 4:53:05 PM EDT

From Gierasch — he wanted to make sure he understood terms before drafting docs. He's working on this now.

4/30/24 4:53:37 PM EDT

looks right to me but wanted to be sure

4/30/24 4:56:54 PM EDT

+17176291559

I understood the 400,000 to include the 225k not above but now I'm re-reading and questioning it. I had originally given her 400 K. Why don't you draw up as 400k as that was what we had a recent talk about

4/30/24 4:57:12 PM EDT

Ok

5/1/24 12:40:41 PM EDT

Daryl, please see your email — we received docs from Gierasch's office regarding Cypress.

5/1/24 2:26:58 PM EDT

Ok to send?

5/2/24 1:51:16 PM EDT

from Cypress Counsel to Gierasch:

5/2/24 1:51:17 PM EDT

From: David Ma <DLM@JMBM.com (mailto:DLM@JMBM.com)>  
Sent: Thursday, May 2, 2024 1:09 PM  
To: Gierasch, Stephen <SGierasch@mcneeslaw.com (mailto:SGierasch@mcneeslaw.com)>  
Subject: RE: Paramount Management Group/Automated ATM Solutions, Inc. - Holdback [JMBM-LA.79730.0001]

[EXTERNAL]

Thanks, do you have the interim monthly financials for 2024 or Daryl's personal financial statement?

Dave Ma

|

Partner

5/2/24 1:52:02 PM EDT

+17176291559

Sending mine right now

5/2/24 1:52:03 PM EDT

+17176291559

To her

5/2/24 1:52:06 PM EDT

ok

5/2/24 2:23:07 PM EDT

We are having our Spring Leadership Summit next week. Our senior leaders will be with us in person (about 15 people). While I don't want to spend money for this now as we are tight financially, I am thinking we should go forward with it as these are very important times for us to be together in person and our financial challenges are temporary. Furthermore, I think it would be very good for people to hear from you in person as well. By cancelling or holding virtually I wonder if it sends the wrong signal to the team regarding our financial challenges. Interested in your thoughts on this.

5/2/24 2:24:15 PM EDT

I chatted with Dan about this as well as he talked with Maya and she brought this up to him. I'm meeting with Dennis and Steve soon discuss.

5/2/24 2:25:27 PM EDT

additionally, we've already committed to hotels, restaurants, etc. and we have vendor flying in to present cash to card product so we'd likely have costs to cancel.

5/2/24 2:33:09 PM EDT

+17176291559

You should 100% go forward with it

5/2/24 2:33:13 PM EDT

+17176291559

Is it local?

5/2/24 2:33:19 PM EDT

yes. marriott.

5/2/24 2:37:24 PM EDT

can I count on you to be there to talk to the group?

Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.net, +17179175670, randall.leanman@paramountmvp.com, +17179172753

5/2/24 2:37:37 PM EDT

we are together Monday night, all day Tuesday and Wednesday

5/2/24 2:37:55 PM EDT

Dan Burkholder is leading a discussion Tuesday afternoon,

5/2/24 2:42:10 PM EDT

need you there first thing Tuesday morning

5/2/24 2:42:48 PM EDT

please 😊

5/2/24 2:46:11 PM EDT

or anytime on Tuesday

5/2/24 2:51:53 PM EDT

Tuesday	Department Presentation
8:00-9:00	breakfast
9:00-9:30	M&A - John
9:30-10:00	IT - Leigh
10:00-10:30	retention - Neil
10:30-11:00	Brandon - liz
11:00-11:10	Break
11:15-12:00	Distributor Success
12:00-12:30	Lunch
12:30-1:30	tech ops- Jacoba/Greg
1:30-3:30	Dan
4:00-5:00	Q&A

Wednesday	Department Presentation
8:00-9:00	breakfast
9:00-9:30	Sales - Jim
9:30-10:15	Onboarding-Christie
10:15-10:45	Compliance & Payout - Janne
10:45-11:15	Customer Service - Vonda
11:15-11:30	Break/ or question and answer time
11:30-12:00	Install - Clifton
12:00-12:45	Lunch
12:45-1:30	Cash - Todd
1:30-2:00	2024 Goals - Steve
2:00-2:30	Game
2:30-3:00	Break or additional time for follow-up questions
3:00-5:00	Ready Credit

5/2/24 2:52:20 PM EDT

Here is the agenda. We are doing team building events and dinner on Tuesday and Wednesday evenings as well

5/2/24 3:33:11 PM EDT

+17176291559

Prefer morning?



5/2/24 3:33:21 PM EDT

+17176291559

Topic?

5/2/24 3:33:46 PM EDT

Yes. That works.

5/3/24 9:55:53 AM EDT

good morning Daryl — we have two term sheets that we've been negotiating (Aficionado, Spring Payments). we can get these signed but they will want to close quickly (end of June). Given our financing changes with our investors, do you want us to back away from these or continue?

5/3/24 12:22:24 PM EDT

also, just a reminder that David Dove is meeting with us Thursday morning

5/3/24 12:22:42 PM EDT

in Lancaster. we are sending an invitation to you

5/3/24 12:23:13 PM EDT

+17176291559

➔ Replying to you, 2024-05-03 09:55:53: « good morning Daryl — we have two term sheets that we've been negotiating (Aficionado, Spring Payme... »

Can we at least push this off until Monday?

5/3/24 12:23:19 PM EDT

+17176291559

Can we talk about it then?

5/3/24 12:24:02 PM EDT

yes we can talk then. Sellers have been pushing us to respond but I'll let them know

5/3/24 12:25:03 PM EDT

from Gierasch

5/3/24 12:25:04 PM EDT

Randall and Daryl—following up on my call with Randall, attached are the updated agreements marked to show my suggested revisions. Of note:

- The \$400,000 “Settlement Payment” was increased to \$625,000. Please let us know what you want to do with that (push back, accept, etc)
- They have asked to be brought up to date (through March 31) on monthly GP payments (Randall is looking into). The Amendment currently has a blank for that amount. Once you have that amount, Randall—please pass along to Angie who will drop it in.
- Lastly, they are asking for interim financials

Please let us know your thoughts and any feedback to the points above and we'll go from there.

5/3/24 12:25:21 PM EDT

I'm working on points 2 and 3. you will need to handle point 1

5/5/24 2:26:19 PM EDT

+17176291559

Happy Sunday. I sent her my PFS Friday. I think the GP payment throughout this like 12 K.

5/5/24 2:26:38 PM EDT

+17176291559

I will need to get clarification on the 625 verses 400 K

5/5/24 2:27:00 PM EDT

It is 12 K we have that in the dock and I just need to get the financial statements for Paramount

5/5/24 2:27:33 PM EDT

Yes, I believe that is the only outstanding issue at this point other than the financial statements for 2024

5/5/24 2:27:40 PM EDT

+17176291559

If we're presenting through March financials, I would just do the summary roll up financials at Brandon has developed. Just assume X amount of hardware sales to show strong profit. Send me a copy before we Send to get.

5/5/24 2:28:16 PM EDT

Yes, that is the plan. I will send to you before we send out.

5/5/24 2:29:33 PM EDT

+17176291559

I know I committed to meet the team Tuesday morning however, you stated anytime Tuesday could work. I'm feverishly trying to finish off this recap and could be in Philadelphia Tuesday morning. Is there anyway I could grab 1520 minutes with the team Tuesday afternoon in a private setting?

5/5/24 2:30:20 PM EDT

+17176291559

If there is any other options, let me know.

5/5/24 2:30:37 PM EDT

+17176291559

Or if you think teams car could be as effective I could do that and then get back and show up at the barnstormer event for 45 minutes to an hour as well

5/5/24 2:33:35 PM EDT

I think in person is best. Tuesday afternoon works or we could do Wednesday morning

5/5/24 2:36:51 PM EDT

Happy to have you at barnstormer event as well if you like. But we will have ready credit people there too so won't be as private

5/5/24 2:37:01 PM EDT

+17176291559

Wednesday morning would even be better and I'd love to be there in person.

5/6/24 7:16:17 AM EDT

Just a reminder that David Dove is here Thursday morning. We sent you an invite

5/6/24 8:20:15 AM EDT



Consolidated Financials PMG Q1 2024.pdf

5/6/24 8:20:34 AM EDT

let me know if ok to release

5/6/24 10:20:50 AM EDT

+17176291559

Can you send this via email quickly as I'll be back in front computer shortly

5/6/24 10:21:27 AM EDT

yes. sent.

5/6/24 2:03:02 PM EDT

any word on acquisitions? I have someone pushing me for a response.

5/6/24 2:44:42 PM EDT

also, need to confirm when you are appearing at the SLT meeting. Thanks

5/7/24 8:04:22 AM EDT

Good morning Daryl. Any thoughts on when you are joining us ?

5/7/24 8:05:46 AM EDT

+17176291559

Tomorrow. What are the options again?

5/7/24 8:07:03 AM EDT

+17176291559

Time options

5/7/24 8:08:45 AM EDT

Anytime between 9 AM and 3 PM

5/7/24 8:09:11 AM EDT

Or if you want, we are going to proof tonight we have the whole restaurant so you're welcome to join us there as well if you prefer

5/7/24 8:09:22 AM EDT

That's at 7:30

5/7/24 9:08:33 AM EDT

did you approve the consolidated financials to be sent to Cypress?

5/7/24 9:09:21 AM EDT

sorry. Saw you approved by email

5/7/24 9:20:08 AM EDT

Are you confirmed for Thursday morning at 8:30 am with David Dove?

5/7/24 9:25:54 AM EDT

Meeting at Blackworth

5/7/24 9:29:43 AM EDT

Also regarding specific acquisition. If we don't respond today he is walking from the deal. Need to know your thoughts about this.

5/7/24 10:32:02 AM EDT

Also Bluvyne is going to close June 1

5/7/24 2:07:22 PM EDT

+17176291559

Can you send me the economic models for all these, including the listing of ATM locations? I presume we have a processor statements.

5/7/24 2:26:46 PM EDT

Yes. In a meeting now but will get

5/7/24 4:01:05 PM EDT

Daryl, please see your email for Bluevine and Spring payments. These are both acquisitions that we are pursuing. Bluevine is closing the end of the month that's Post due diligence. Spring payments is at term sheet and we've drug him out for weeks. He is now so frustrated he is ready to walk.

5/7/24 4:15:43 PM EDT

Spring payments is a \$400k deal. This is the one ready to walk

5/8/24 8:28:11 AM EDT

Good morning Daryl hope all is well with you. Just checking to see when you thought you might stop by today?

5/8/24 8:29:09 AM EDT

Also, needed to know your thoughts on those two acquisitions and what we should do at this point.

5/8/24 10:12:42 AM EDT

Trying to plan our schedule here. Any update on your availability?

5/8/24 10:32:42 AM EDT

Fourth Floor. Marriott. Susquehanna Board Room

5/8/24 11:59:37 AM EDT

+17176291559

I left my house five minutes ago, so I should be there in 15

5/8/24 11:59:50 AM EDT

Ok

5/8/24 12:07:52 PM EDT

We are NOT in the Montgomery house. Turn left when you come in the front door and go up the first elevator. 4th floor

5/8/24 12:12:16 PM EDT

Susquehanna board room

5/8/24 1:14:45 PM EDT

i have an extra ticket for the baseball game if you are able to join us we'd love it

5/8/24 1:27:39 PM EDT

also, need to know if you are joining David Dove and me tomorrow morning for breakfast.

5/8/24 5:29:46 PM EDT

David dove?

5/9/24 6:42:40 AM EDT

This morning at 8:30. Can you join us?

5/9/24 7:02:38 AM EDT

At blackworth.

5/9/24 7:12:21 AM EDT

+17176291559

Apologies. How important is it that I'm there? Have a bunch of craziness I'm dealing with right now.

5/9/24 7:12:30 AM EDT

+17176291559

Will be difficult

5/9/24 7:15:46 AM EDT

I can handle. I invited Dennis too. It's just that you said you wanted to be there.

5/9/24 7:16:00 AM EDT

I think he wants to talk about acquiring us.

5/9/24 7:16:21 AM EDT

If there is a message you want me to deliver to him let me know.

5/9/24 7:21:07 AM EDT

+17176291559

I did

5/9/24 7:21:22 AM EDT

+17176291559

I would hear her mouth, but be careful about how much information you share as it will go everywhere.

5/9/24 7:21:39 AM EDT

Ok

5/9/24 7:21:52 AM EDT

+17176291559

I still want to be there, but I'm deal with urgent issues

5/9/24 7:24:05 AM EDT

I understand

5/9/24 7:29:38 AM EDT

My basic message is that we are not ready to sell. Is that true?

5/9/24 7:33:20 AM EDT

+17176291559

Unless the multiple is right. I would be careful to share our GP number, but maybe letting him know that our core business is approaching 2m monthly and we have other entities as well which will keep it vague ...Meaning PowerQuest in first regions and others

5/9/24 7:33:48 AM EDT

+17176291559

Or just ask him what he pays for companies GP over 2 million without telling him if we were there or over it

5/9/24 7:34:25 AM EDT

+17176291559

Remember, what happened last time? He told everyone we were selling in the field. I would just say we're always open, but we're not strategically positioning for it right now.

5/9/24 7:35:02 AM EDT

Ok. I remember.

5/9/24 9:58:00 AM EDT

Good morning Daryl, just met with David Dove. It's good that you weren't there. This was merely a sales and customer relationship call. There was no discussion about anything related to a sale.

5/9/24 9:58:32 AM EDT

+17176291559

Liked "Good morning Daryl, just met with David Dove. It's..."



5/9/24 10:25:49 AM EDT

Assume we need to reschedule board meeting today. Just letting you know w

5/9/24 10:34:06 AM EDT

Received the following from Paramount Customer service

5/9/24 10:34:09 AM EDT

Ryan received this VM this morning, Jeremy Kuchenbecker (sp?) a partner with Prestige. Wanted to talk with Ryan about cash management for Q1.

Ryan said he doesn't know how Jeremy obtained his information and didn't know who the guy was. I said to forward me the vm and I would take care of it.

Passing along, I will not be contacting him per Daryl's recent texts.

Brandon Hall

5/9/24 10:34:31 AM EDT



5/9/24 2:52:31 PM EDT

+17176291559

I'll review but make sure team knows to refer all calls emails to prestige and not comment legally! Thanks.

5/9/24 2:53:07 PM EDT

Everyone knows to get this to me and we will take care of it

5/9/24 2:53:39 PM EDT

Also wanted to let you know that Spring Payments the 400 K acquisition is being moved to June 30. Are you OK with that? We are getting ready to send a term sheet out.

5/9/24 3:01:12 PM EDT

+17176291559

Liked "Also wanted to let you know that Spring Payments t..."

5/9/24 3:01:29 PM EDT

are you ok with this?

5/9/24 3:02:31 PM EDT

+17176291559

Yes

5/9/24 4:08:48 PM EDT

From Gierasch regarding Cypress agreement:

5/9/24 4:08:49 PM EDT

Daryl and Randall—here are the latest—signed agreements and the legal fees invoice which is \$12,550. Definitely on the pricier end considering we drafted the documents initially and our fees are under \$2500.

LMK how you want to handle the fees. Once we sort that out, we can send you docusigns.

5/9/24 5:02:46 PM EDT

+17176291559

So this is Samantha legal fees?

5/9/24 5:03:12 PM EDT

Yes

5/9/24 5:13:29 PM EDT

+17176291559

Wow

5/9/24 5:13:58 PM EDT

Yep looks like they're taken Advantage of us

5/9/24 5:14:02 PM EDT

+17176291559

Need to pay. Just cover it and we can lay Steve

5/9/24 5:14:42 PM EDT

Ok

5/10/24 3:02:37 PM EDT

Please see email DocuSign for signature on Cypress doc. They're looking for this today.

5/10/24 7:19:41 PM EDT

+17176291559

Can't find it.

5/10/24 7:19:47 PM EDT

+17176291559

Rose was outbid at w accident

5/10/24 7:19:53 PM EDT

+17176291559

Out today.

5/10/24 7:20:08 PM EDT

Sorry to hear. Let me check

5/10/24 7:27:57 PM EDT

+17176291559

Just found it!

5/10/24 7:28:10 PM EDT

Cool

5/13/24 4:17:04 PM EDT

any word on funding coming in? We are getting feedback from employees that they are wondering if they should look for work elsewhere.

5/13/24 4:17:57 PM EDT

its just the not knowing I think that is causing the issue.

5/13/24 4:32:08 PM EDT

+17176291559

I'm so sorry Randall. I'm working hard on it. They definitely don't need to be looking elsewhere. Is there a lot of vendors that they're feeling it from or is it just the impact that they've experienced the last month with merchants and otherwise not being paid?

5/13/24 4:33:12 PM EDT

right now, we are not getting cut off by anyone but that could change tomorrow. Just general worry by employees as there is no end in sight.

5/13/24 4:45:01 PM EDT

just got this email from customer service:

5/13/24 4:45:03 PM EDT

From: CustomerSupport <customersupport@paramountmgp.com (mailto:customersupport@paramountmgp.com)>  
Sent: Monday, May 13, 2024 3:06 PM  
To: Retail Sales @ Paramount <retailsales@paramountmgp.com (mailto:retailsales@paramountmgp.com)>  
Subject: FW: Cash Management Call Q1

Hello,

Jeremy has called in multiple times since the email below was sent: Friday 5/10/24 and today 5/13/24. Could someone please call him back today or tomorrow to go over cash management in Q1? Email below has his contact information and the company he is calling from.

Thank you!

Lili Hart  
ell

Customer Support Representative

Lili.Hartell@paramountmgp.com (mailto:Lili.Hartell@paramountmgp.com)

888-971-3116

5/13/24 4:51:48 PM EDT

+17176291559

Calling him right now

5/13/24 4:52:01 PM EDT

Liked "Calling him right now"

5/14/24 9:24:37 AM EDT

where do you want to meet for my performance review? I'm working from home today so could meet you at Bent creek or anywhere else.

5/14/24 9:35:26 AM EDT

Also are you going to bourbon and bacon tonight?

5/14/24 9:35:37 AM EDT

I plan to go.

5/14/24 1:01:19 PM EDT

+17176291559

Randall, I'm very close on funding is there anyway that we can push this back a few days. I have a call with this firm out of Charlotte and they want to talk at 2 PM.

5/14/24 1:01:27 PM EDT

+17176291559

I was scheduled for you early next week

5/14/24 1:01:32 PM EDT

Yep. Thats fine.

5/14/24 1:01:34 PM EDT

+17176291559

I don't want to frustrate you, so please be honest if you prefer today

5/14/24 1:01:48 PM EDT

No worries I'm good

5/14/24 1:05:48 PM EDT

Anything that gets us closer to funding takes priority in my book

5/14/24 1:33:57 PM EDT

we could really use \$400k this week for payroll (includes executive and leadership bonuses for 2023), merchant payments and some payments to vendors who are threatening to shut us off. There is \$200k in restricted. If we push off Steve, Dennis and my bonus payments we can get by with this \$200k in restricted.

5/14/24 1:34:53 PM EDT

\$400k allows Steve, Dennis and me to get paid for bonus this week. I've already talked to them and told them that we may need to defer our bonus payments so this won't come as a surprise

5/14/24 1:49:45 PM EDT

I sent email to you regarding cash detail

5/14/24 9:00:58 PM EDT

Any thoughts on this? We need to make decisions tomorrow morning.

5/14/24 9:02:09 PM EDT

+17176291559

I am hopeful that has some funding late tomorrow. I don't think I will know until one or 2 PM. Do we have to know in the morning?

5/14/24 9:56:18 PM EDT

We have to fund tomorrow so payroll checks are covered on Thursday. I think we should be fine at 2 pm

5/15/24 12:30:15 PM EDT

Hello Daryl — are you still good to meet today with Dennis and Dan to talk Golden Gate?

5/15/24 12:30:45 PM EDT

also, we need to make a cash decision soon. Brandon says payroll company needs to know by 2 pm what we are doing.

5/15/24 12:31:43 PM EDT

just a reminder that we need \$200k to cover base payroll. \$400k if we are going to pay exec bonuses at this time. We have \$200k in restricted account.

5/15/24 1:28:01 PM EDT

+17176291559

Take the 200k. Hope to have wire by end of day. Hold on bonus

5/15/24 1:28:28 PM EDT

ok. thanks

5/15/24 1:47:08 PM EDT

+17176291559

How much is a total payroll?

5/15/24 1:47:12 PM EDT

+17176291559

Without bonus

5/15/24 1:48:25 PM EDT

total payroll without Exec bonus is \$527k

5/15/24 1:48:41 PM EDT

this includes management bonuses

5/15/24 1:48:55 PM EDT

and 3 for 3s

5/15/24 1:49:12 PM EDT

and sales commissions for the past quarter

5/15/24 5:27:17 PM EDT

+17176291559

Which still is concerning to me is that we're not even cash flowing operations. I have covered 100% of all the debt for the last four weeks but it looks like we don't even have enough to cover payroll. Can you have Brandon do analysis throwing away all the debt payments for the last 3-4 weeks?

5/15/24 5:30:09 PM EDT

Brandon is on vacation this week but yes we will provide.

5/15/24 5:32:11 PM EDT

Dennis will get this for you

5/15/24 5:41:54 PM EDT

If you need before Brandon returns, we can provide however it would be better if we wait for Brandon.

5/15/24 8:02:24 PM EDT

+17176291559

No, I can wait

5/17/24 10:16:00 AM EDT

Good morning Daryl. Just checking in to see how the refinance is going?

5/17/24 10:28:06 AM EDT

+17176291559

Get you updates in a few hours as I'm in meetings

5/17/24 10:28:23 AM EDT

Liked "Get you updates in a few hours as I'm in meetings"

5/18/24 9:08:49 AM EDT

Good morning Daryl. Moving day for us! Remodel is mostly complete and we are moving into the house. Just checking to see if you can give a quick summary of our current status for refinance. Thanks.

5/18/24 8:34:15 PM EDT

+17176291559

Congrats! I'm eager to see it

5/18/24 8:35:08 PM EDT

+17176291559

We have some small funding coming in tomorrow to get the hundred K back and we can probably slap another couple hundred k. I have multiple term sheets that we're executing on and waiting to see which one funds first.

5/18/24 8:39:32 PM EDT

Cool. Looking forward to getting this behind us.



5/18/24 8:40:00 PM EDT

Will have you and char over when we are completely finished to see the place.

5/20/24 1:55:27 PM EDT

ok to sign: PFB Rd. 63 - APA.pdf, PFB Rd. 62 - APA.pdf

5/21/24 8:20:20 AM EDT

ok to sign the above?

5/21/24 8:29:08 AM EDT

+17176291559

Yes

5/22/24 12:22:52 PM EDT



Embracing Cash: The Surprising Trend Among Millennials and Gen Z - May 16, 2024.pdf

5/22/24 12:22:52 PM EDT

fyi

5/22/24 12:51:58 PM EDT



Thillens Pitch Deck - 5.21.2024.pdf

5/22/24 12:52:41 PM EDT

Following from Scheck and team — See attached deck for Thillens (this is derived from information memorandum provided by Redstone). As noted in their deck we would her an LOI out to them by Thursday of this week so would need to get with Daryl prior. As you will see this is a large regional armored company in the Midwest. Based on their financials and our evaluation we believe this deal will have a valuation around 6x at 21m. Please review and let us know questions and we can discuss further.

5/22/24 12:53:33 PM EDT

I assume we have no interest in this as this would be an investment in going vertical but didn't want to make that call without your input.

5/22/24 12:54:11 PM EDT

possibility for synergies with Margo too but we didn't evaluate this

5/22/24 2:54:43 PM EDT

please see your email - we forwarded an investor email to you

5/23/24 8:42:31 AM EDT

Good morning Daryl — just checking to see if you agree that we do NOT want to pursue an acquisition of Thillens. Thanks

5/23/24 8:55:30 AM EDT

+17176291559

I agree we do not want to pursue right now

5/23/24 8:55:56 AM EDT

Liked "I agree we do not want to pursue right now"

5/23/24 9:56:35 AM EDT

We need an hour of your time tomorrow afternoon please to review the cash questions you had last week and the forecast for the next couple of weeks. What time works for you?

5/23/24 10:17:42 AM EDT

Including Cypress payment, we are going to need about \$2.6M in first week of June.

5/23/24 10:27:06 AM EDT

+17176291559

How would we need more than cypress payment? Is this company bleeding major operating cash? I need the cash flow I requested so I can understand as it appears we are big negative on operations

5/23/24 10:27:55 AM EDT

we are not negative on operations. That's what we want to discuss with you tomorrow.

5/23/24 10:28:41 AM EDT

+17176291559

K. I have a funeral tomorrow I need to move some things around.

5/23/24 10:29:06 AM EDT

ok.

5/23/24 10:29:33 AM EDT

you can use my performance evaluation time if you like

5/23/24 10:29:38 AM EDT

at 11 am

5/23/24 1:00:17 PM EDT

Are we confirmed to meet at 10 am tomorrow to discuss cash?

5/23/24 1:00:49 PM EDT

+17176291559

Have funeral. Deciding if I'm going. Can you do later?

5/23/24 1:01:21 PM EDT

Can do later let me know what time works for you so I can let Brandon Dennis and Liz know

5/23/24 10:45:33 PM EDT

+17176291559

I will have some funds coming tomorrow but may need a wire out in the morning. I can bring back a half million of working Capital if you really need it by afternoon.

I'd like to preserve what we can for cypress until funding comes in. We have now executed term sheets/commitment letters on a new facility of 30 million and I can put a material piece of that to Paramount!

5/23/24 10:46:27 PM EDT

Cool. Will you have time to discuss cash flow tomorrow?

5/23/24 10:48:20 PM EDT

+17176291559

Do I need to be in front of a computer? I'll be driving to this funeral.  
Could be best early afternoon.

5/23/24 10:48:47 PM EDT

Probably best to be in front of computer. We can talk Monday if it works better for you.

5/23/24 10:49:11 PM EDT

+17176291559

That would be strongly preferable

5/23/24 10:51:42 PM EDT

Ok. That's fine. Morning or afternoon better?

5/23/24 11:03:30 PM EDT

+17176291559

Afternoon

5/23/24 11:03:37 PM EDT

+17176291559

Name the time.

5/23/24 11:04:08 PM EDT

Sorry. Forgot Monday is holiday. Tuesday afternoon ok?

5/23/24 11:04:46 PM EDT

+17176291559

Shit, yeah. 1030 or 5.

5/23/24 11:05:07 PM EDT

Let's do 5. Thanks

5/23/24 11:09:39 PM EDT

+17176291559

Send invite please!

5/23/24 11:09:53 PM EDT

Ok

5/24/24 8:48:53 AM EDT

I assume we are pushing our 1:1 and performance evaluation this morning. When do you want to meet next week?

5/30/24 7:02:26 AM EDT

Good morning Daryl. Have Tommy and Joe pinging me to talk about our cash issues. Do we have anything more definitive around funding?

5/30/24 7:04:56 AM EDT

Also Samantha from Cypress is saying that she is not hearing from you

5/30/24 8:32:54 AM EDT

Also, are we having board meeting tomorrow morning? We all need time to prepare for this and want to be sure we are ready for it.

5/30/24 8:35:51 AM EDT

also, we have finance team scheduled for tomorrow as well.

5/30/24 8:38:20 AM EDT

+17176291559

➔ Replying to you, 2024-05-30 08:32:54: « Also, are we having board meeting tomorrow morning? We all need time to prepare for this and want to b... »

What do you prefer? I'll be on train to New York but can do it. I'd be good deferring as well. Up to you.

5/30/24 8:38:38 AM EDT

+17176291559

➔ Replying to you, 2024-05-30 07:02:26: « Good morning Daryl. Have Tommy and Joe pinging me to talk about our cash issues. Do we have anything m... »

Can I call them? Are they late in getting paid?

5/30/24 8:39:03 AM EDT

+17176291559

➔ Replying to you, 2024-05-30 07:04:56: « Also Samantha from Cypress is saying that she is not hearing from you »

Messaged her Tuesday. Will do again. Is.

5/30/24 8:39:06 AM EDT

+17176291559

➔ Replying to you, 2024-05-30 07:04:56: « Also Samantha from Cypress is saying that she is not hearing from you »

Now

5/30/24 8:40:02 AM EDT

Yes you may call them. We were late paying their monthly maintenance payment and we have been paying advances and bonuses for new business I think they are current.

5/30/24 8:41:08 AM EDT

➔ Replying to you, 2024-05-30 08:32:54: « Also, are we having board meeting tomorrow morning? We all need time to prepare for this and want to b... »

As we also have FTM meeting together tomorrow. Let's take a little time from that to do an abbreviated board meeting. Does that work for you?

5/30/24 8:42:20 AM EDT

➔ Replying to you, 2024-05-30 08:32:54: « Also, are we having board meeting tomorrow morning? We all need time to prepare for this and want to b... »

I will find out from Brandon if we owe TNT anything as of this moment

5/30/24 10:37:14 AM EDT

Here is Joe Picone's mobile number  
(917) 681-7318

5/30/24 3:31:22 PM EDT

by the way, it appears that the word is on the street to customers about PMG cash struggles. Doug Michola called to tell me that we have a 120 location opportunity that was uncertain if they wanted to go with us as they heard we are struggling. No doubt competitors using this against us.

5/30/24 3:32:24 PM EDT

+17176291559

Let's do call me our acquisition partners.

5/30/24 3:32:46 PM EDT

+17176291559

➔ Replying to you, 2024-05-30 08:32:54: « Also, are we having board meeting tomorrow morning? We all need time to prepare for this and want to b... »

I'm good pushing if you are

5/30/24 3:33:17 PM EDT

yes. already pushed. using the time for a finance team meeting to review financials.

5/30/24 3:34:01 PM EDT

I talked to Doug and he felt comfortable going back and telling them that we are ok and that this is a temporary issue that will soon be resolved.

5/30/24 3:34:32 PM EDT

I told him we are recapitalizing and he seemed fine.

5/30/24 4:55:08 PM EDT

Any chance you can call Joe/Tommy at some point soon. He is blowing up my text. This is all about advances and bonuses not getting paid for the last couple of months.

5/30/24 4:55:33 PM EDT

+17176291559

Glorious board meeting. Our respond to his tax.

5/30/24 4:55:42 PM EDT

+17176291559

You're saying we're just doing less advances and less bonuses?

5/30/24 4:56:03 PM EDT

no. we aren't paying any advances and bonuses as we iced these due to lack of cash

5/30/24 4:56:48 PM EDT

I believe Tommy/Joe may have paid them and need to be reimbursed. So in a way we do owe them money

5/31/24 8:17:03 AM EDT

+17176291559

Courtesy update - I'm heading to New York so hopefully the final meeting for the recap. I can do the 930 but will not have access to video or screen given driving. Do you want to push it to early next week?

I'm also in contact with Samantha and looking to get her some phones today and then Monday and Tuesday

To Blu acquisition, I'm perplexed by it as I specifically told Dennis that if we can push it to June 30 we want to do it and he said that will work. That was a couple weeks ago. Do you want me to call that guy and put a narrative around why we need to do it June 30.

5/31/24 8:21:36 AM EDT

yes, let's push to Monday or Tuesday morning. Are these available to you?

5/31/24 8:21:57 AM EDT

touching base with Dennis on Bluvyne and will respond.

5/31/24 8:26:04 AM EDT

i was scheduled to be off next week but decided to work the mornings instead. so this would work better for me.

5/31/24 8:30:52 AM EDT

Dennis is going to call the seller and try to convince him to push to the end of June. We may need your help if this doesn't go well. Thanks



5/31/24 8:55:57 AM EDT

also, need to know your thoughts regarding acquisitions moving forward — we have significant overhead \$ for M&A. If acquisitions are not going to be our focus for growth moving forward, then I want to redirect \$ toward organic growth. Interviewed a CRO/CMO for PMG and ready to make an offer but don't have these funds in our budget. He is the current sales marketing lead for Coinsource. We will have him drive BTM sales (machines and Just Cash) and ATM growth for PMG plus launch video topper, cash to card and other new programs. He's interviewing with other companies now. Burkholder, Steve, Dennis and I have interviewed and believe he is an excellent cultural fit and don't want to lose him. The budget aspects of this become alot easier if we are swapping Maya's \$ for his plus one or two other head count positions.

5/31/24 8:58:30 AM EDT

also, please remember to call Joe/Tommy this morning as well. Thanks

5/31/24 9:23:38 AM EDT

+17176291559

➔ Replying to you, 2024-05-31 08:21:36: « yes, let's push to Monday or Tuesday morning. Are these available to you? »

Tuesday late afternoon is best

5/31/24 9:23:46 AM EDT

+17176291559

Actually, I can do Tuesday morning

5/31/24 9:23:52 AM EDT

Ok. Thanks.

5/31/24 9:24:20 AM EDT

+17176291559

➔ Replying to you, 2024-05-31 08:26:04: « i was scheduled to be off next week but decided to work the mornings instead. so this would work better... »

Apologies I did not see this before I responded

5/31/24 9:24:51 AM EDT

No problem

5/31/24 3:38:25 PM EDT

Samantha is hitting me on text about payment.

5/31/24 4:00:10 PM EDT

+17176291559

I hit her three hours ago and just again. I'll be calling her.

5/31/24 4:27:23 PM EDT

Liked "I hit her three hours ago and just again. I'll be ..."

6/3/24 8:36:31 AM EDT

good morning Daryl — I hope you had an enjoyable weekend. Checking in on three items: 1. Reminder that we need \$1.1 M tomorrow to cover payments to Cypress customers. (we pushed Bluvyne to end of June). 2. How did you make out with funding trip on Friday? 3. I need to make a decision on sales and marketing executive. what are your thoughts on my previous email?

6/3/24 8:37:00 AM EDT

➔ Replying to you, 2024-05-31 08:55:57: « also, need to know your thoughts regarding acquisitions moving forward — we have significant overhea... »

this is the text from earlier. Bringing this to the top of your list.

6/3/24 1:34:01 PM EDT

Hello Daryl, trying to keep this moving forward. Any thoughts on the acquisition front?

6/3/24 7:39:29 PM EDT

Please see email from Samantha. She is threatening legal action

6/3/24 7:40:39 PM EDT

+17176291559

I sent her a text at 7:32. She must not have seen it.

6/3/24 7:40:48 PM EDT

+17176291559

I'll pull down her email

6/3/24 7:41:13 PM EDT

Liked "I'll pull down her email"

6/3/24 8:12:25 PM EDT

Regarding my previous text about acquisitions. I suspect given Samantha's influence in our industry and everybody in our industry who know that we are struggling financially that we will be challenged to overcome this with future acquisitions at least having a holdback. As a result I think we need to consider changing course. Also, we have a number of major Cypress customers who are up for contract renewal this year. I fear that this will be a factor in their decision.

6/3/24 8:16:54 PM EDT

I will give you a plan to dismantle our acquisition group so we can reduce overhead unless you tell me otherwise

6/4/24 8:23:38 AM EDT

good morning Daryl — just making sure you saw Gierasch' email from last night.

6/4/24 2:45:49 PM EDT

Just received another email from Samantha. I will forward to you.

6/4/24 8:10:20 PM EDT

Received another email from Samantha. Just making sure you see it.

6/4/24 8:35:45 PM EDT

Please also see email from Brandon. Appears to be an investor

6/4/24 8:37:55 PM EDT

+17176291559

Again, had responded to Samantha minutes before she sent that email. I'm in communication with her.

6/4/24 8:38:04 PM EDT

Liked "Again, had responded to Samantha minutes before sh..."

6/4/24 8:38:11 PM EDT

+17176291559

No email from Brandon

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

6/4/24 8:38:42 PM EDT

Just sent. Thought he copied you

6/5/24 4:24:39 PM EDT

Another email from Samantha.

6/6/24 7:21:44 AM EDT

+17176291559

I've been in contact with her multiple times yesterday including an email last night. I'll forward the email I sent her last night.

6/6/24 7:22:05 AM EDT

+17176291559

I know you're on PTO this week so I presume our one01 is off. I prefer to do it in person anyway when you're back

6/6/24 7:22:06 AM EDT

Ok. Thanks. I will keep ignoring her then.

6/6/24 7:22:20 AM EDT

Yep. That's fine. I will be back next week

6/6/24 8:05:15 AM EDT

please send Samantha email that you referenced so I can stay in the loop on this. Thanks

6/6/24 9:43:22 AM EDT

any update on funding? we have a number of vendors who are getting ready to shut us down and this will mean that we can't keep our machines operational. these were not included in our cash forecast so this is above what we have needed.

6/6/24 2:21:16 PM EDT

Daryl, demand letter emailed from Cypress legal counsel to us.

6/7/24 4:30:17 PM EDT

<https://apple.news/AoTjjnaMCRHGIZyYQ8p1IEQ>

6/7/24 4:30:17 PM EDT

Maybe it's time? 🤔

6/10/24 8:01:25 AM EDT

good morning Daryl. I hope you had a nice weekend. ok to sign: PFB Rd. 64 - APA.pdf

6/10/24 8:01:38 AM EDT

+17176291559

Loved "https://apple.news/AoTjjnaMCRHGIZyYQ8p1IEQ"

6/10/24 8:01:40 AM EDT

+17176291559

Yes

6/10/24 8:04:02 AM EDT

also, just sent an email of a certified letter. I think this is an investor. If not, please let me know.

6/10/24 8:05:18 AM EDT

also, just sent two emails from Samantha's counsel

6/10/24 10:44:17 AM EDT

assuming we are able to pay exec bonuses this week, you mentioned adding some additional comp on this since we delayed this a month. Thoughts on this?

6/10/24 4:41:25 PM EDT

Steve is worried that we are in deep trouble financially with our economic model with investors. He would like to meet with you. we spent the first hour of our 1:1 talking.

6/10/24 4:43:13 PM EDT

+17176291559

I'm literally on boat in Turks and Caicos I'll be back on land tomorrow. I will present our details of deleverage plan we are going implementing in two weeks

6/10/24 4:43:20 PM EDT

+17176291559

Can he do a call with you on me tomorrow afternoon?

6/10/24 4:43:23 PM EDT

ok. sorry.

6/10/24 4:43:42 PM EDT

yes we can do that.

6/10/24 4:43:58 PM EDT

tell us what time works for you and we will be on the call.

6/10/24 4:49:19 PM EDT

also, are we going to have cash to pay exec bonuses on this week's payroll? he (and I) are needing this for renovations that we are doing. We have resources elsewhere but difficult to tap as they are tied up and were counting on this.

6/10/24 4:49:56 PM EDT

+17176291559

Yes! Pay.

6/10/24 4:50:17 PM EDT

this is an additional \$200k but not sure we will have cash to pay it.

6/10/24 4:50:55 PM EDT

+17176291559

What is the breakdown again?

6/10/24 4:51:09 PM EDT

+17176291559

A lot a bridge facility is coming in until our \$30 million recap at the end of this month

6/10/24 4:51:53 PM EDT

ok. assuming most of the \$30M will go to investors. any expectation on how much is going to be left for Paramount.

6/10/24 4:52:12 PM EDT

+17176291559

The investor leverage will take us down to 5 million a month. I'll share it with you tomorrow.

6/10/24 4:54:08 PM EDT

what time tomorrow?

6/10/24 4:54:32 PM EDT

+17176291559

1?

6/10/24 4:54:43 PM EDT

EST?

6/10/24 4:54:43 PM EDT

+17176291559

Meaning our payments will be less than 5 million a month

6/10/24 4:54:48 PM EDT

yep

6/11/24 2:24:41 PM EDT

➔ Replying to you, 2024-06-10 10:44:17: « assuming we are able to pay exec bonuses this week, you mentioned adding some additional comp on this ... »

bringing this back to the top of your text chain

6/11/24 2:25:56 PM EDT

+17176291559

➔ Replying to you, 2024-06-10 10:44:17: « assuming we are able to pay exec bonuses this week, you mentioned adding some additional comp on this ... »

What heels good? 5,7 or 10% increase. I'm good with 7 or 10

6/11/24 2:26:23 PM EDT

let's do 7% then. Thanks

6/11/24 2:26:39 PM EDT

+17176291559

Cool

6/11/24 2:26:44 PM EDT

Thanks!

6/12/24 11:40:04 AM EDT

Ray Davis ripcord issue is coming up again. Our delay tactic appears to be having some impact? Or maybe he's hearing about our financial difficulties and wants to get some payment rather than risk getting nothing? Or maybe our subpoena of Empower is causing concern? We have no evidence to support our claim yet and would need to compel Empower to release the docs through the courts as they have refused to do so. This is a gamble as they could provide evidence that doesn't support our claim then we'd be in a bad position meaning that Ray could demand significantly more than what he's demanding at the moment. I did a review of emails and saw that Empower didn't change to Fiserv but actually went to another processor so this weakens our claim significantly. However, it is possible that compelling Empower to release docs we could find out that they notified Ray that they were leaving Sharenet before we purchased them. In which case, we'd have significantly lower payout if any at all. Ray's attorney is asking us to close the gap and present an offer. Following is what we presented and how they responded.

6/12/24 11:40:19 AM EDT

- \$1,650,000 (total settlement amount)
- \$450,000 in cash at signing
- \$1,200,000 payable quarterly, accruing interest at 6%
- no personal guaranties, but as I mentioned, we will be agreeable to (creditor favorable) collection remedies in the settlement agreement

6/12/24 11:40:24 AM EDT

Ray's response:



6/12/24 11:40:37 AM EDT

- your client will have to come very, very close to the \$1.9 million Ray has demanded. It is important to keep in mind that from his first settlement offer, Ray dropped \$1 million and did so in order to achieve what he thought (and, frankly, I thought) would be a quick settlement
  - similarly, your client will have to come much, much closer to \$800,000 at signing, as Ray originally demanded
  - there is no reason interest should not be a 8% (prime rate); if your client needs money to fund the settlement, then it can borrow at 8%, but Ray should not be "financing" his own payout
  - payments will need to be made monthly, just like a bank would require payments
  - I would appreciate understanding what you mean by "favorable creditor collection remedies"; if you mean a confession of judgment for the entire amount upon default less monies paid to date, that is really no concession because such a provision would have to be part of any settlement agreement
  - we will agree to the 2 week extension to answer or plead running from the current October 10 deadline, but, absent extraordinary circumstances (such as a serious personal problem) this will be a final extension

6/13/24 1:38:50 PM EDT

good afternoon Daryl — just to let you know regarding Samantha payment — I'm really worried this will have an impact on customer business that we purchased from her. We have a number of contract renewals for Cypress distributors and I'm worried that they will leave if they feel she has been slighted. We can survive it but wanted to make sure you were aware. I think just maintaining open communication with her will help.

6/14/24 8:07:14 AM EDT

Sorry, fat fingers

6/16/24 7:44:13 AM EDT

Happy Fathers Day! Hope you have an enjoyable day with your family.

6/18/24 4:07:50 PM EDT

Good afternoon Daryl — I need to give legal some direction here regarding Sharenet. Thoughts?

6/18/24 4:08:31 PM EDT

+17176291559

➔ Replying to you, 2024-06-13 13:38:50: « good afternoon Daryl — just to let you know regarding Samantha payment — I'm really worried this... »

I missed this, apologies. I will have her taken care of soon.

6/18/24 4:08:45 PM EDT

thanks

6/18/24 4:08:48 PM EDT

+17176291559

➔ Replying to you, 2024-06-16 07:44:13: « Happy Fathers Day! Hope you have an enjoyable day with your family. »

Belated to you as well!

6/18/24 4:08:54 PM EDT

haha! thanks

6/18/24 4:10:39 PM EDT

+17176291559

➔ Replying to you, 2024-06-12 11:40:37: « • your client will have to come very, very close to the \$1.9 million Ray has demanded. It is importa... »

What does your gut say?

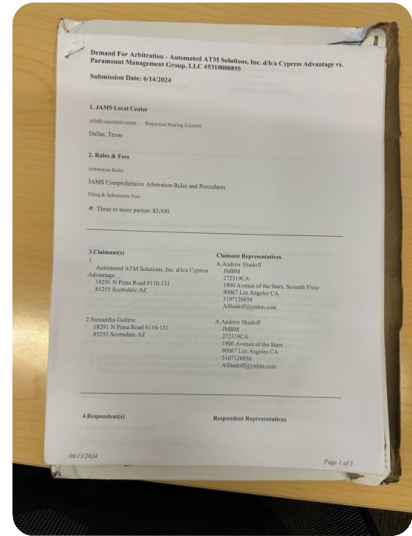
6/18/24 4:13:43 PM EDT

My feeling is that \$1.8 takes it and \$600k up front

Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.net, +17179175670, randall.leanman@paramountmgp.com, +17179172753

6/20/24 8:53:03 AM EDT



6/20/24 8:53:12 AM EDT

How would you like to handle this?

6/26/24 9:26:19 AM EDT

good morning Daryl — it's been a while since we had a 1:1 and I'm feeling the need to talk asap. Can you make some time tomorrow or Friday? thanks

6/26/24 9:27:33 AM EDT

I prefer in person if possible.

6/26/24 9:43:08 AM EDT

I can meet Thursday evening as well.

6/26/24 11:02:07 AM EDT

i can talk Saturday morning as well

6/26/24 1:28:48 PM EDT

going to let you respond to Daryl's text please.

6/26/24 1:28:58 PM EDT

sorry this was for Dennis

6/27/24 12:15:51 AM EDT

+17176291559

➔ Replying to you, 2024-06-26 09:27:33: « I prefer in person if possible.  
»

For sure.

6/27/24 12:16:03 AM EDT

+17176291559

Maybe chill over weekend?

6/27/24 12:16:08 AM EDT

+17176291559

You home?

6/27/24 6:16:44 AM EDT

Yes. I'm here. What works for you?

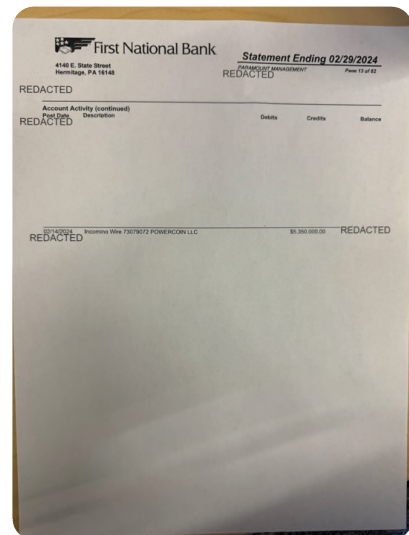
6/27/24 6:36:38 AM EDT

I have plans each evening this weekend but otherwise available.

6/27/24 3:33:12 PM EDT

Just received the following via fedex

6/27/24 3:33:29 PM EDT





Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

6/27/24 3:33:29 PM EDT

UCC FINANCING STATEMENT  
POWERCON LLC

1. NAME & PHONE OF CONTACT (if other than debtor)  
2. NAME & PHONE OF CONTACT (if other than debtor)  
3. SECURED PARTY INFORMATION  
4. COLLATERAL

Debtor Information:  
Debtor Name: POWERCON LLC  
Address: 413 N PRINCE STREET, LANCASTER, PA 17602  
Phone: (717) 399-1111

Secured Party Information:  
Secured Party Name: SQUARE FUNDING LLC  
Address: 413 N PRINCE STREET, LANCASTER, PA 17602  
Phone: (717) 399-1111

Collateral Table:  
1. ACCOUNTS RECEIVABLE  
2. INVENTORY  
3. EQUIPMENT  
4. OTHER COLLATERAL

6/27/24 3:33:29 PM EDT

David Fogel  
1225 Franklin Avenue / Suite 201 / Garden City, New York 11530 / Tel: (516) 279-1420 / Fax: (516) 279-1318  
dfo@dfogel.com

June 11, 2024

VIA OVERNIGHT DELIVERY  
POWERCON LLC  
413 N PRINCE STREET  
LANCASTER, PA 17602

Re: Creditor: Square Funding LLC d/b/a Square Advance  
Merchant Debtor: PARAMOUNT MANAGEMENT GROUP, LLC d/b/a CASH TO GO  
SERVICES D/B/A RE-APPLIQUE HELLER CAPITAL GROUP, LLC  
PRIORITY FUND II, LLC, SHAREST LLC, HELLER INVESTMENT  
HOLDING LLC and EARTH FRED HELLER  
45-982792  
Merchant Vendor Tax ID:  
Balance/Amount Owed  
by Merchant Debtor: \$1,785,895.00

Dear Sir or Madam:

This office represents SQUARE FUNDING LLC d/b/a SQUARE ADVANCE ("Creditor") in the above-referenced matter. PLEASE NOTE: you are not in any legal trouble. You are receiving this notice due to having been identified as possibly having a business relationship with the above-referenced Merchant Debtor and therefore, you may potentially be subject to this notice. The above-referenced Balance is the amount owed to Creditor by the Merchant Debtor, not you.

The above-referenced Merchant Debtor entered into and defaulted under the terms of a certain Future Receivables Agreement with Creditor (the "Agreement"). Pursuant to the Agreement, Creditor maintains a Lien and Security Interest in and on any and all of the Merchant Debtor's accounts, receivables, and other collateral described in the enclosed UCC-1 Financing Statement (collectively "Accounts"), which may be maintained or preserved by you on their behalf. The Lien and Security Interest was perfected on April 15, 2024 with the filing of the UCC-1 Financing Statement, a copy of which is enclosed.

Accordingly, you are hereby notified of our client's Lien and Security Interest and we respectfully demand your compliance with Sections 9-607 and 9-609 of the Uniform Commercial Code which require you to immediately place a hold on any monies, payments and/or remittances which you may owe, currently or in the future, to the Merchant Debtor up until the amount of the above-stated Judgment/Balance Owed. Once the hold is placed, said monies should be remitted to our office as attorney for Creditor and made payable to "David Fogel P.C., Attorneys". I am confident that once the above-requested action is taken, in addition to mitigating the risk to you with respect to appropriate fulfillment of the funds in which our client has a secured interest, this matter will be quickly resolved.

➔ IF YOU OWE ANY MONEY TO OR HAVE AN ACCOUNT WITH THE MERCHANT, contact our office to ensure that you have placed a hold on all Accounts and payments monies owed to the Merchant Debtor and the amount being held.

➔ IF YOU DO NOT OWE ANY MONEY TO OR DO NOT HAVE AN ACCOUNT WITH THE MERCHANT, contact our office to confirm that you do not owe any monies to the Merchant Debtor so that we may update our file accordingly.

Your anticipated cooperation is appreciated.

s/ David Fogel  
Esq.  
File # 1179

6/27/24 3:34:40 PM EDT

+17176291559

I just spoke to their legal and they're sending out letter today resending it.

6/27/24 3:34:53 PM EDT

+17176291559

Rescinding it

6/27/24 3:36:02 PM EDT

ok.

6/27/24 4:31:32 PM EDT

You joining the call?

6/27/24 4:31:38 PM EDT

+17176291559

Yes

6/27/24 4:43:23 PM EDT

+17176291559

Who is Devin?

6/27/24 4:43:38 PM EDT

Litigator for McNees

6/27/24 4:43:44 PM EDT

+17176291559

L

6/27/24 4:43:47 PM EDT

+17176291559

K

6/27/24 4:43:55 PM EDT

He is working on SHARENET too

6/27/24 4:55:05 PM EDT

- \$1,650,000 (total settlement amount)
  - \$450,000 in cash at signing
  - \$1,200,000 payable quarterly, accruing interest at 6%
  - no personal guaranties, but as I mentioned, we will be agreeable to (creditor favorable) collection remedies in the settlement agreement

6/27/24 4:55:17 PM EDT

- your client will have to come very, very close to the \$1.9 million Ray has demanded. It is important to keep in mind that from his first settlement offer, Ray dropped \$1 million and did so in order to achieve what he thought (and, frankly, I thought) would be a quick settlement
- similarly, your client will have to come much, much closer to \$800,000 at signing, as Ray originally demanded
- there is no reason interest should not be a 8% (prime rate); if your client needs money to fund the settlement, then it can borrow at 8%, but Ray should not be "financing" his own payout
- payments will need to be made monthly, just like a bank would require payments
- I would appreciate understanding what you mean by "favorable creditor collection remedies"; if you mean a confession of judgment for the entire amount upon default less monies paid to date, that is really no concession because such a provision would have to be part of any settlement agreement
- we will agree to the 2 week extension to answer or plead running from the current October 10 deadline, but, absent extraordinary circumstances (such as a serious personal problem) this will be a final extension

6/28/24 10:18:22 AM EDT

Speaking with Steve in 1:1 now. He (and Dennis and me) are significantly worried about the Switchcommerce thing and what if it happens to CDS. Can we schedule a call with you to discuss on Monday morning?

6/28/24 2:14:45 PM EDT

Any thoughts on getting together tomorrow or Sunday?

6/28/24 3:26:05 PM EDT

+17176291559

➔ Replying to you, 2024-06-28 10:18:22: « Speaking with Steve in 1:1 now. He (and Dennis and me) are significantly worried about the Switchcomme... »

Yes, this is coming off. He committed to do it. Trying to reach him today.

6/29/24 9:02:09 AM EDT

+17176291559

Getting back to you shortly

6/29/24 9:02:38 AM EDT

No worries. Happy to talk Monday too if that works better for you



6/29/24 9:02:58 AM EDT

I can meet Monday evening as well

7/3/24 8:09:42 AM EDT

good morning Daryl — just making sure you see the emails from Gierasch office regarding demand letters from Cypress counsel.

7/3/24 8:10:11 AM EDT

actually emails are directly from Cypress counsel

7/3/24 8:12:09 AM EDT

also, Will Powers is pushing us for a response which you will also see in email this morning.

7/4/24 9:38:36 AM EDT

Good morning Daryl,

What I wanted to communicate to you in person and as I mentioned through text yesterday is that we are feeling significant stress around our current cash flow issues to the point that we are struggling to maintain a healthy positive outlook on our future and hope you can help.

Here is what we experience on a daily basis over the last three months -- managing payments for aging AP and suppliers who are out of patience, ATM industry-wide awareness of our issues and people reaching out to us which is made worse by the Cypress holdback, investors communicating with our people and pressuring us into paying, losing surcharge and interchange from SwitchCommerce and our inability to prevent it, continuously paying investors from operating cash making it difficult to keep our commitment to pay suppliers by a certain date, and expectations for imminent funding that doesn't materialize.

As a result, we need to spend time communicating with people and encouraging them that this is temporary and that we have this under control. However, as time progresses with no appreciable progress and awareness on what is happening, we start to feel that Heller Capital and thereby Paramount might be in imminent threat of survival. Add this to the cash flow challenges at Margo and this worry is amplified.

What makes matters worse for me is that I know you are aware of these issues -- how damaging this is to our brand and values and how this is antithetical to who you are -- that leads me to feel that this challenge might be bigger than all of us and may no longer be within our control.

As we don't see what you see, here are some questions for which we need your help understanding:

First, ultimately, we are most worried about the investor threat to our existence as it appears that they are owed significant money to retire these funds. Do we have financial commitments in writing that will pay off these funds before investors exercise rights to take the ATMs and merchant contracts away from us? If so, when will this occur?

Second, do we have funding to recover the operating cash that has been removed from Paramount so that we can pay suppliers? If so, when will this occur?

Thanks for your help on this and happy to discuss as well.

7/4/24 10:18:06 AM EDT

+17176291559

Happy fourth to you and thank you for your text. I've literally just been going nonstop finishing these facilities. Let me get you a detailed response. Yes, the back payment will occur and the investor firewall is being put in place.

7/4/24 10:18:46 AM EDT

Thanks and happy fourth to you as well!

7/8/24 6:36:43 AM EDT

Good morning Daryl given the cypress merchant payment situation that occurred this weekend. I think we need answers to the questions I posed above sooner than later. I fear Steve is looking for the door here and need something definitive. Also we just hired a CRO and need this to explain to him as well.

7/8/24 7:40:11 AM EDT

+17176291559

Apologize I've been underground on this financing. I'll respond to the above.

7/8/24 7:40:18 AM EDT

Loved "Apologize I've been underground on this financing...."

7/8/24 7:45:17 AM EDT

I have meeting with exec team today at 3:30 so if I could have something before, then that would be very helpful thanks

7/8/24 6:40:10 PM EDT

+17176291559

In funding all day. Sorry to fail you. Can I still send something you can send out.

7/8/24 6:42:48 PM EDT

Yes please. I told the team it's coming. Thanks

7/8/24 8:58:01 PM EDT

I assume you saw the email from Jeff Silverman. Copied numerous people at Paramount.

7/9/24 6:38:47 AM EDT

Good morning Daryl - just to be clear that we do NOT have enough cash to make payroll this week. We need an injection preferably today so we can pay customers. We have been sending what little cash we have to companies who have shut us off.

7/9/24 8:05:51 AM EDT

+17176291559

How much is needed for payroll. 100K minimum?

7/9/24 8:06:11 AM EDT

+17176291559

I see TNT bonus, which we should absolutely not pay until next week

7/9/24 8:06:38 AM EDT

Yes. I'm going to hold everything I can.

7/9/24 8:07:25 AM EDT

+17176291559

100 K is what is needed?

7/9/24 8:07:40 AM EDT

Hang on. I want to get in front of my computer

7/9/24 8:08:09 AM EDT

+17176291559

Some funding hit overnight so I can wire.

7/9/24 8:14:46 AM EDT

I push all of the code red A/P to next week except \$50k and push customer payments a full day, we are still \$350k in need on payroll

7/9/24 8:14:54 AM EDT

that will come back to us over the weekend.

7/9/24 8:16:07 AM EDT

if we send code red payables and pay customers on time this week, we need \$450k on Thursday. We could pay all that back on Monday next week

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+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

7/9/24 8:18:59 AM EDT

+17176291559

Wow. How much is payroll?

7/9/24 8:19:07 AM EDT

285k

7/9/24 8:20:42 AM EDT

I pushed clatworthy \$800k another week.

7/9/24 8:20:51 AM EDT

I'm sure he is going to be reaching out to you soon

7/9/24 8:21:52 AM EDT

+17176291559

We're definitely not 500 K cash flow positive last 30 days unlike May. Can Brandon quickly refresh june positive cash flow?

7/9/24 8:22:12 AM EDT

+17176291559

I was moving 200 K over which will get us positive with the payments we paid out. It feels like we have negative cash flow but I could be wrong.

7/9/24 8:22:51 AM EDT

A	B	C	D	E	F	G
	February	March	April	May	June	July
Payments not funded:	\$ 1,137,477.21	\$ 1,137,477.21	\$ 433,388.48			
Libertas Pulls:						
Overdraw Loan Payment	\$ 60,069.76	\$ 60,069.76	\$ 60,069.76	\$ 60,069.76	\$ 60,069.76	\$ 60,069.76
LendSpark Pulls	\$ 84,886.36	\$ 84,886.36	\$ 84,886.36			
Balance Pulls	\$ 236,097.35	\$ 236,097.35	\$ 236,097.35			
Gold Capital Wire		\$ 192,800.00				
WebBank Payment		\$ 60,577.53				
Op cash used to pay OHL		\$ 248,000.00		\$ 28,000.00		
Unrecovered Libertas Payment 5/8/2024 (found in rec 6/7/2024)				\$ 4,821.43		
Remainder of Fundomatic Payment 5/24				\$ 10,352.68		
Square Funding wire 5/24/2024				\$ 67,450.00		
LendSpark, WebBank, Libertas 5/29/2024				\$ 306,410.63		
Heller Interest Invoice 6/5/2024					\$ 75,000.00	
Heller wire (amount unfunded) \$34,600 - 6/13/2024					\$ 14,000.00	
BAV H IV wire \$75K - 6/13/2024					\$ 75,000.00	
Aquatic Management wire \$25K - 6/13/2024					\$ 25,000.00	
Heller wire \$34,000 6/13/2024					\$ 34,000.00	
Amount owed from wires sent 6/18/2024					\$ 24,000.00	
Amount owed from wires sent 6/26/2024					\$ 167,000.00	
OHL wire 6/28/2024					\$ 25,000.00	
Switch Processor - Restricted surcharge settlements (\$6.14 daily average)					\$ 34,132.06	\$ 58,032.42
Switch Processor - Restricted interchange settlements						\$ 36,894.04
Heller wire 7/3/2024 (expected to be replenished 7/9)						\$ 189,000.00
Supplier Group ATM, LLC wire 7/9/2024						\$ 72,990.00
Restricted/Op Cash Reimbursements:						
Heller Capital Group - Incoming wire 7/1/2024						\$ (85,000.00)
\$250K Restricted Transfer (pending action on)					\$ (7,000.00)	
Golden Gate wire back - 6/11/2024					\$ (35,000.00)	
Restricted to 3440			\$ (304,710.71)		\$ (308,000.00)	
For Cypress payment			\$ (330,388.48)			
For Cypress payment			\$ (811,000.00)			
For 3440 merchant payments and ATM group payment			\$ (413,433.00)			
ATM Group wire			\$ (33,491.23)			
Payment Transfer to 3440				\$ (200,000.00)		
3440 back to restricted				\$ 505,388.02		
Net of monthly activity	\$ 1,137,477.21	\$ 1,508,448.68	\$ (205,328.48)	\$ 579,489.92	\$ 397,261.82	\$ 242,516.22
				Net Op Cash Owed 7/9/24	\$ 3,656,997.39	

7/9/24 8:23:02 AM EDT

you took \$600k from us in June and July

7/9/24 8:23:36 AM EDT

\$639

7/9/24 8:24:04 AM EDT

including orrstown payment

7/9/24 8:25:47 AM EDT

here is aging A/P

7/9/24 8:25:49 AM EDT

Total Overdue	Current	1-30	31-60	61-90	90+	Grand Total
\$ 3,413,244.90	\$ 1,705,563.77	\$ 1,206,122.48	\$ 480,840.25	\$ 643,616.27	\$ 1,082,665.90	\$ 5,118,808.67

7/9/24 8:26:02 AM EDT

+17176291559

Tell Brandon to add the 206 K check from Friday as that's not on here

7/9/24 8:26:27 AM EDT

ok

7/9/24 8:28:59 AM EDT

+17176291559

So switch is holding 120 K and has not released it?

7/9/24 8:29:27 AM EDT

correct

7/9/24 8:30:08 AM EDT

actually they aren't holding it. they redirected it to the people that enforced the UCC

7/9/24 8:30:32 AM EDT

not 100% sure of that but I will verify.

7/9/24 8:32:29 AM EDT

+17176291559

I don't think that's the case. I'm confident they are just holding it. Please confirm ASAP. This should be released.

7/9/24 8:32:44 AM EDT

I just pinged accounting to be sure

7/9/24 8:54:22 AM EDT

+17176291559

Is there not the ability to hold payables today so 150 K covers payroll today?

7/9/24 8:54:51 AM EDT

+17176291559

➔ Replying to you, 2024-07-09 08:32:44: « I just pinged accounting to be sure »

Can someone quickly tell you this?

7/9/24 8:55:02 AM EDT

➔ Replying to you, 2024-07-09 08:32:44: « I just pinged accounting to be sure »

Steve Gernes says that Kevin who is the President of Switch Commerce told him that they redirected the funds.

7/9/24 8:55:48 AM EDT

Yes, I am holding all but \$50,000 of payables today. The 50,000 has to go out because it is for our partner who loads cash in the dispensaries if they go down, we are completely screwed and they put us on credit hold

7/9/24 8:56:08 AM EDT

The customer payments are the only other major items we could potentially delay for a day, but that doesn't buy us enough time

7/9/24 8:56:18 AM EDT

Anything more than that and I get worried that we lose business

7/9/24 8:56:51 AM EDT

But none of these are getting us to where we need to be for payroll

7/9/24 8:57:13 AM EDT

➔ Replying to you, 2024-07-09 08:32:44: « I just pinged accounting to be sure »

I've asked Steve to confirm this again with Kevin

7/9/24 8:59:23 AM EDT

I've been managing cash this way on a daily basis and trying to push but after a while it all gets bunched up and there's not much flexibility that we have anymore

7/9/24 9:04:53 AM EDT

So our funding isn't coming through this week?

7/9/24 9:05:08 AM EDT

+17176291559

Yes it is. You need funding today.

7/9/24 9:05:18 AM EDT

Tomorrow

7/9/24 9:06:10 AM EDT

I pushed the ap and that gets us to tomorrow. Thursday is when payroll is pulled

7/9/24 9:13:36 AM EDT

For clarity, am I correct in stating the following?

- For cash settlement, all funds for yesterday and today will be in the cash provider's account tomorrow
- For surcharge settlement, where PMG was the account holder, all those funds are not settling to PMG, but rather to the Trust account you were provided

7/9/24 9:13:54 AM EDT

this is Steve's email to Kevin and Kevin replied that this was correct regarding Switch funds.

7/9/24 9:15:07 AM EDT

also to be clear — Switch is still redirecting funds to this entity.

7/9/24 10:12:14 PM EDT

+17176291559

After you see overnight receipts, please tell me the minimum needed to meet payroll of 285 on Thursday?

7/9/24 10:12:56 PM EDT

Will do.



7/9/24 10:13:46 PM EDT

How are you holding up?

7/9/24 10:14:29 PM EDT

Thinking about you. I'm here if you need any help

7/9/24 11:50:50 PM EDT

+17176291559

Loved "Thinking about you. I'm here if you need any help "

7/9/24 11:50:58 PM EDT

+17176291559

I'm concerned about you

7/9/24 11:51:54 PM EDT

I'm fine. My needs are simple. 🙄. Cash for Paramount and investors that are pacified.

7/10/24 7:56:03 AM EDT

Assuming that we are not meeting for my performance review and one on one this morning. If I am mistaken, please let me know where you'd like to meet as I'd like to be in person when we do it. Thanks.

7/10/24 8:32:05 AM EDT

+17176291559

Correct. With funder.

7/10/24 8:32:23 AM EDT

Liked "Correct. With funder. "

7/10/24 8:39:02 AM EDT

we need to get back to legal on our offer to Ray Davis. thoughts on what you'd like to do here?

7/10/24 8:39:06 AM EDT

I'm ok with whatever

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7/10/24 9:52:54 AM EDT

	BB	BC	BD	BE	BF	BG	BH	BI	BJ
	7/10	7/11	7/12	7/15	7/16	7/17	7/18	7/19	7/22
1 Book Balance:									
2									
3 Bank Balance:	325,174	532,793	(282,003)	(206,603)	156,420	131,441	162,677	217,677	(521,399)
4									
5 Surcharge Revenue:	81,513	100,000	110,000	400,000	100,000	102,500	105,000	117,500	400,000
6									
7 Other Inflow/Outflow:	266,863			100,000					
8									
9									
10 Routine Operating Outflows:									
11 Payroll and EE Commissions		(295,367)		(41,509)					
12 Exec Bonuses									
13 Concur		(15,091)							
14 CC Pmt (Dennis' CC)							(50,000)		
15 Chase CC Pmt (Randall's CC)									(86,000)
16 Rent and Location Payments - Check	(83,793)	(116,909)	-	-	(39,846)	(59,932)	-	(81,713)	-
17 Rent and Location Payments - ACH	(31,261)	(582,730)	-	(65,193)	(29,508)	(71,264)	-	(44,046)	-
18 Consulting Payments									
19 Merchant Bonus/Advance Check			(20,000)					(15,000)	
20 Merchant Bonus/Advance ACH								(15,000)	
21 WSFS/Cash Connect								(797,500)	
22 First Premier Bill					(121,411)				
23 Health Insurance									
24 Misc	(109,526)	(21,000)	(34,800)	(8,283)	(14,000)				
25 Total Operating Outflows - NO AP:	(140,787)	(914,786)	(34,600)	(94,977)	(166,979)	(71,264)	(50,000)	(856,576)	(80,000)
26									
27 O/S Checks 100%	296,182	390,091	385,091	330,091	344,937	379,869	354,869	426,582	401,582
28 O/S Checks 50%	149,091	195,045	192,545	165,045	172,468	189,934	177,434	213,291	206,791
29									
30 Positive/Overdrawn	383,692	(477,049)	(399,149)	33,375	(41,028)	(27,258)	40,242	(734,690)	(482,190)

7/10/24 9:55:00 AM EDT

to cover payroll tomorrow AND pay customers whom we have already pushed off, we need \$475k. If I push customers one more day, we can get by tomorrow without additional cash and still be ok for payroll. That said, we need \$400k for Friday or we are toast. I suspect we will cause a firestorm if we don't pay tomorrow as planned.

7/10/24 12:08:30 PM EDT

If we don't get CDS cash tomorrow, we will not be able to cover payroll

7/10/24 12:08:57 PM EDT

Or other source of cash.

7/10/24 12:20:32 PM EDT

Just looking as I'm driving, we might be able to make it because I think we were counting on 100,000 coming in from CVS so we will not be able to pay any merchants which is its own problem

7/10/24 12:24:08 PM EDT

+17176291559

I'm getting legal to act on the letter from last week. CDS is reacting to something from June 11.

7/10/24 12:26:50 PM EDT

Ok. Should not have started this one on one convo with you probably I should have you respond to Dennis and Steve. The fallout from this will be very bad for us with employees.

7/10/24 2:16:52 PM EDT

is this the end of the line for us? I'm fearing the worst.

7/10/24 2:21:19 PM EDT

+17176291559

None of these contracts be acted on. Shane Hesson is dealing with it as they are fraud and broke usersy laws.

I'm delversging 2.5 years of the 6 years now and balance next quarter

I need to finish this funding today/tomorrow and it takes care of everyone. I can get some money over for payroll if We need it.

I'm sorry for the stress. What squares is doing is not legal based other agreement.

7/10/24 2:22:10 PM EDT

We are ok with payroll tomorrow but I have no way to give staff assurance that we will survive

7/10/24 2:22:19 PM EDT

Beyond this.

7/10/24 2:24:33 PM EDT

If we tell them tonight that we have lost CDS the word will get out and there will be widespread panic

7/10/24 2:26:34 PM EDT

+17176291559

They were doing an injunction on CDS. I thought everything was being handled based on what -Square told me last week and I've been too busy with the funding to do much follow up which is on me. I can do a call with your team Friday morning. Let them know. This is a fraudulent contract that broke laws and taking a predatory approach which needs an injunction

7/10/24 2:27:29 PM EDT

Ok. Can we tell them that you have cash coming in on this week and how much?

7/10/24 2:39:13 PM EDT

here is what I'm proposing to send to Executives and accounting/finance. can we provide assurance of cash coming in ?

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Certification in Support Page 192 of 810

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

7/10/24 2:39:17 PM EDT

Per Daryl — what square is doing is not permitted by their agreement and is predatory/illegal. Daryl's legal is seeking an injunction. He is finalizing funding that will retire investor debt by 2.5 years of the 6 years now and the balance next quarter. We will have \$ cash by Friday. He is will to talk with the accounting staff Friday morning to explain.

7/10/24 2:51:59 PM EDT

+17176291559

Liked "Per Daryl — what square is doing is not permitted ..."

7/10/24 2:52:20 PM EDT

Can I give any assurance of cash coming in this week and how much?

7/10/24 2:59:15 PM EDT

we are going to need \$450k tomorrow if we hope to cover payroll and customer payments. if delay customer payments again, we will have just enough cash to cover payroll.

7/10/24 2:59:31 PM EDT

assumes CDS holds payment from us.

7/10/24 2:59:49 PM EDT

also, I just received this text

7/10/24 2:59:51 PM EDT

I have tried unsuccessfully to reach you to discuss the forthcoming litigation to be brought by Superior against Paramount and your possible personal liability therein. Feel free to contact me at your earliest convenience to discuss.

7/10/24 2:59:55 PM EDT

I plan to ignore

7/10/24 3:00:14 PM EDT

+17176291559

Ignore

7/10/24 3:00:20 PM EDT

yep.

7/10/24 3:04:25 PM EDT

anything on cash coming in this week?

7/10/24 3:07:00 PM EDT

+17176291559

Def some cash. I need until morning. Def 100k or more for payroll tomorrow

7/10/24 3:08:07 PM EDT

ok. what is expectation for when big traunch will arrive?

7/10/24 3:08:47 PM EDT

by the way multiple people in the company are receiving the same text message from Superior.

7/10/24 3:39:09 PM EDT

➔ 2024-07-10 15:07:00: « Def some cash. I need until morning. Def 100k or more for payroll tomorrow »

we need \$450k if we don't want to risk customer business as we have already pushed off payments

7/11/24 5:23:15 PM EDT

Any opportunity for me to take some chips off the table at this juncture? Turning 60 in 9 months and feeling that I've been waiting awhile for a sale event which might be years away. Not talking total cash out but feeling like it's time to think about this. Realize this may not be the appropriate time but thought I'd ask

7/11/24 5:36:02 PM EDT

As Paramount makes up the bulk of my retirement I have been feeling the need to talk to about a sale event with you before all this went down.

7/11/24 5:38:58 PM EDT

As I said before, I'm not looking to retire but feeling the need to plan this way

Text message  
7/11/24 8:34:38 PM EDT

Also, Dennis text about Zook comments on linked in about Paramount being to blame reminded me that I told Dan this morning that my reputation as a leader has been ruined in Lancaster County. It would be difficult for me to find another position here as a result. I know Jerry is blaming me because he told me so. If Jerry is saying this then everyone knows. I have friends and family who have invested with Zook too. So I feel like the fall guy here

7/11/24 8:42:18 PM EDT

It's really to the point that I dont want to come to the gala because I feel this is how I'm viewed or any other company events. Dennis even said Heller capital people told him that it was because we made a bad investment.

7/11/24 8:45:34 PM EDT

So ultimately I feel that this is my best shot at a return on my stock as I can't likely start over again if something would happen after this. I hope you see what I'm seeing and feeling. Again im not talking about retiring or leaving Heller Capital. But I am feeling that I need to take some chips off the table for my personal fiduciary to my family.

7/11/24 8:47:26 PM EDT

I am happy to talk about this. But you need to know how I feel and what is behind my communication

iMessage  
7/11/24 10:13:20 PM EDT

+17176291559

That's horrifying. I'm not hearing that. Please remember that Jerry is all drama and creates a lot of realities that are not grounded.

The reputation is not ruined at all. Gerry has seen in a light/correct perspective by 90% of people.

7/11/24 10:14:19 PM EDT

+17176291559

It's never as bad as you think It is when bad and it's never as good as you think as it when it's good. Things will change quickly when this storm is over..

7/11/24 10:14:41 PM EDT

+17176291559

I will get you out if you want out

7/11/24 10:15:12 PM EDT

I think I do. Given my age I would like that. But I don't want to stop working for you.

7/11/24 10:17:50 PM EDT

Loved "It's never as bad as you think It is when bad and ..."

7/11/24 10:21:03 PM EDT

I'm thinking half of my stock at this point depending on price. I think that would put me in better head space and make feel a bit more secure

7/11/24 10:21:31 PM EDT

+17176291559

Loved "I'm thinking half of my stock at this point depend..."

7/11/24 10:21:46 PM EDT

+17176291559

I want to take care of you. You deserve it. I'm sorry the last couple months have been so tough.

7/11/24 10:22:06 PM EDT

Thanks Daryl. I really do appreciate they

7/11/24 10:22:08 PM EDT

That

7/11/24 10:25:16 PM EDT

And I truly love working with and for you. I don't want that to end.

7/11/24 10:38:33 PM EDT

+17176291559

Loved "And I truly love working with and for you. I don't..."

7/11/24 10:38:40 PM EDT

+17176291559

Feelings are mutual

7/16/24 9:36:50 AM EDT

Just saw obituary online that Earl Shirk passed away. Just letting you know in case you didn't hear it.

7/18/24 9:13:29 AM EDT

Assume we are not going to meet for 1:1/performance evaluation this today?

7/18/24 12:28:19 PM EDT

+17176291559

I think we need to get this madness over so we have a clear hat on before the one on one. We will backdate your comp again. Are you OK with that?

7/18/24 12:28:32 PM EDT

yes. I'm fine

7/18/24 12:28:33 PM EDT

thanks

7/19/24 6:19:27 PM EDT

At some point when you can see your way clear, will you please tell me what you're thinking for valuation of my stock and potential timing?

7/22/24 9:14:14 AM EDT

+17176291559

Apologies for delay. Let me process it and get back to you.

7/24/24 5:52:32 PM EDT

Good afternoon Daryl just landed. On my way back from the airport. Saw Clatworthy's text. Wanted to make sure you saw it. I'm assuming you did.

7/26/24 2:43:23 PM EDT

please see email I just sent you about William Marketing



Messages - +17176291559

Certification in Support Page 197 of 810

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

7/26/24 2:43:35 PM EDT

not sure what this is but thought you should be aware

7/26/24 2:50:34 PM EDT

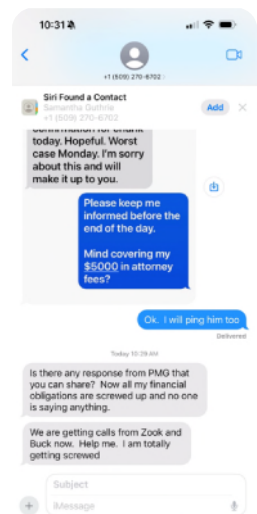
+17176291559

I think that's jordan Mitch

7/26/24 2:50:44 PM EDT

ok.

7/27/24 10:31:52 AM EDT



7/27/24 10:31:52 AM EDT

Screenshot 2024-07-27 at 10.31.37 AM

7/27/24 10:32:07 AM EDT

Samantha Guthrie

Text message

7/27/24 11:45:54 AM EDT

+17176291559

I will text her.

iMessage

7/27/24 12:01:35 PM EDT

Thanks

7/27/24 1:08:30 PM EDT

please also see Devin's email to you — this is our legal counsel for Cypress and arbiter is requiring information on Tuesday. He needs your response to know what to say

7/27/24 1:08:50 PM EDT

also, he's been requesting a response from you regarding Ray Davis

7/27/24 1:08:54 PM EDT

in another email.

7/29/24 2:10:22 PM EDT

Not sure how to interpret your lack of response to me. Everything ok?

7/29/24 2:21:43 PM EDT

+17176291559

Sorry. Tied up on this funding.

7/29/24 2:21:54 PM EDT

+17176291559

Will respond now

7/29/24 2:21:58 PM EDT

Ok. Thanks

7/30/24 8:18:31 AM EDT

+17176291559

On call

7/30/24 8:18:35 AM EDT

Ok.

7/30/24 9:06:26 AM EDT

Please call me when you are off the call. Thanks

7/30/24 10:45:52 AM EDT

Did your funding fall apart?

7/30/24 10:46:47 AM EDT

I'm staring at the cliff for Paramount and can't see a way to survive over the next week without funding.

7/30/24 10:47:50 AM EDT

If we don't pay Clatworthy we lose our company owned and if we don't pay cypress customers we lose the bulk of our affiliates

7/30/24 10:48:52 AM EDT

Wondering if I should cancel my trip to Iceland.

7/30/24 10:50:32 AM EDT

+17176291559

Def not! It's just been a nightmare for me on timing. I will get clatworthy taken care of.

7/30/24 10:51:22 AM EDT

Ok. Thanks. Are you sure we are going to be ok?

7/30/24 10:52:28 AM EDT

Are you going to call Clatworthy?

7/30/24 10:52:40 AM EDT

I need to tell him something

7/30/24 11:43:09 AM EDT

What should I tell Clatworthy?

7/30/24 7:36:04 PM EDT

By the way just received a text from one of my relatives that you are involved in a federal tax issue. Thought you should know.

7/30/24 7:38:31 PM EDT

+17176291559

No, it's 100% offset and waiting for me to file the return. It was going to be amended. I can send you information on it. It was an inadvertent filed lien that was not supposed to be filed. It's a PO and being pulled back and then 100% offset.

7/30/24 7:38:44 PM EDT

+17176291559

Price someone from the Prestige investors that was trying to pull up stuff as someone else sent me that as well

7/30/24 7:38:49 PM EDT

+17176291559

Is that what you're referring to?

7/30/24 7:38:56 PM EDT

+17176291559

➔ Replying to you, 2024-07-30 11:43:09: « What should I tell Clatworthy? »

I need to call him tomorrow

7/30/24 7:39:08 PM EDT

I think so. They were not specific about it just said they wanted to make sure we were aware that there was some issue going on so no details were given.

7/30/24 7:39:44 PM EDT

+17176291559

Issue with Prestige and investors or a tax lien?

7/30/24 7:39:55 PM EDT

Said it was an issue with the IRS and that was it

7/30/24 7:40:14 PM EDT

Here is the exact text

7/30/24 7:40:18 PM EDT

Hey, just wanted to check and confirm you are aware of Daryl Heller federal tax issue. It happened to be brought to my attention and i just wanted to make sure you guys are aware.

7/30/24 7:48:22 PM EDT

More...

7/30/24 7:48:32 PM EDT

I don't really have more. We confirmed online with the Lancaster county prothonotary and it showed that there was a federal lien of six mil and all assets are being seized.

7/30/24 7:50:08 PM EDT

+17176291559

No assets seized! It will be fully offset when they file return. I'll gladly send them emails from the IRS if they want to see it.

7/30/24 7:50:56 PM EDT

I believe you. Just wanted to be sure you knew.

7/30/24 7:52:37 PM EDT

How would you like me to respond if anything.

7/30/24 7:52:45 PM EDT

I can just let it go.

7/30/24 8:14:15 PM EDT

+17176291559

I'll send you an email. This was Phantom income on a bonus appreciation that was not taken

7/30/24 8:14:21 PM EDT

+17176291559

You can forward it if you want. I don't care.

7/30/24 8:15:09 PM EDT

Ok. I'm fine letting it go too. Just wanting you to be aware.

7/30/24 8:19:07 PM EDT

I just responded said it was tax lien that was filed in error and is going to soon be resolved. I'm leaving it at that.

7/30/24 8:24:55 PM EDT

+17176291559

I sent you an email

Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.net, +17179175670, randall.leanman@paramountmgp.com, +17179172753

7/30/24 8:25:20 PM EDT

Thanks. They seemed satisfied with my answer.

7/30/24 9:26:09 PM EDT

From Clatworthy regarding your call to him tomorrow

7/30/24 9:26:12 PM EDT

Okay thanks Randall. We are in a position where we need \$700 K tomorrow or funding will be stopped EOD. Want you to know this because it will have operational impacts that your team will need to be aware of, which we are hoping to avoid.

8/2/24 12:14:03 PM EDT

From Quentin Miller. I am not responding but thought you should know.

8/2/24 12:14:06 PM EDT

Hey Randall, I know you and D are trying to work through whatever it is that you're trying to work through  
My question is and the one I keep getting asked is where is all the money that Paramount would've collected since April is that sitting someplace or is it no more?  
Q

8/2/24 1:41:42 PM EDT

Anything definitive for funding?

8/2/24 2:39:18 PM EDT

Please see email for another legal notice that was sent to me

8/2/24 10:11:41 PM EDT

Any updates on funding? Got another friend text asking me about rumors and hoping to see an end to all of this.

8/2/24 10:31:01 PM EDT

Not sure how to interpret your lack of response.

8/2/24 10:36:44 PM EDT

+17176291559

Sorry I'm in Nashville with funder. Not ignoring you. Just seeing this. 100s of messages. Everything will be OK. Can we chat tomorrow?

8/2/24 10:37:05 PM EDT

Yes please.

8/2/24 10:37:30 PM EDT

+17176291559

Liked "Yes please. "

8/4/24 11:23:14 AM EDT

Good morning Daryl. Just checking in to see when we can get a chance to chat. Really just want to know what's happening related to funding and when we can expect this. I was under the impression that this would be done by now based on our last discussion.

8/4/24 12:29:05 PM EDT

+17176291559

Gettin planes. Be home late today. How many hours are you different than me?

8/4/24 12:29:42 PM EDT

I am four hours ahead of you if you are in Eastern time

8/4/24 12:29:54 PM EDT

It's 4:30 here

8/4/24 12:30:10 PM EDT

Pm

8/5/24 7:22:11 AM EDT

Good morning Daryl. Any updates here?

8/5/24 8:22:29 AM EDT

+17176291559

I'll get back shortly. In process of getting Ethan to Cleveland clinic for some treatments today

8/5/24 8:22:52 AM EDT

Ok.

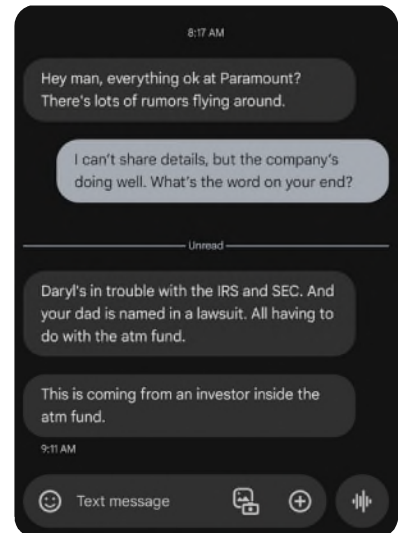
8/5/24 8:24:00 AM EDT

Please give me something as I've been significantly distressed about this. Thanks.

8/5/24 9:14:18 AM EDT

From my son

8/5/24 9:14:22 AM EDT



8/5/24 10:55:02 AM EDT

Daryl?

8/5/24 11:52:18 AM EDT

+17176291559

Need less than 30 minutes

8/5/24 12:04:13 PM EDT

From Clatworthy

8/5/24 12:04:15 PM EDT

Hi Randall, do you have a couple minutes to connect? Having a hard time connecting with Daryl.

8/5/24 12:04:47 PM EDT

+17176291559

I'll text him. I see I missed his call. Let him know I am responding to him today



8/5/24 12:16:13 PM EDT

Thanks. Just let him know

8/5/24 12:34:09 PM EDT

+17176291559

It's such a broken record, but I'm waiting for wire confirmation to hopefully be able to get a half million to you. Still waiting on it. Can I send a group text to the other one to find out what the amount is that is needed for Cypress?

8/5/24 12:35:00 PM EDT

+17176291559

I'm so tired of saying it and you're so so tired of hearing it but if we don't have the remedy in place for the investors, then I'm just doing complete buyouts.

8/5/24 12:35:45 PM EDT

+17176291559

➔ Replying to you, 2024-08-05 09:14:22: (Image)

Sorry you're dealing with this. Rumors flying that are not accurate. Feel free to share the irs information

8/5/24 12:38:32 PM EDT

Thanks. That was Evan's cousin.

8/5/24 12:38:56 PM EDT

What about the full funding of \$3 to \$4 M?

8/5/24 12:39:20 PM EDT

Yes please send to group text

8/5/24 12:45:28 PM EDT

When are we getting full funding

8/5/24 12:52:01 PM EDT

+17176291559

You may want to clarify there is no lawsuit. There is just a demand for cure. No lawsuit filing with Dave or buck

8/5/24 12:52:21 PM EDT

Ok. Thanks.

8/5/24 12:53:55 PM EDT

No SEC investigation?

8/5/24 12:53:59 PM EDT

+17176291559

No

8/5/24 12:54:39 PM EDT

Liked "No"

8/5/24 12:55:02 PM EDT

When can we see full funding?

8/5/24 12:56:12 PM EDT

+17176291559

Very, very very soon. Randall, I am sorry.

8/5/24 12:56:38 PM EDT

Ok. Thanks.

8/5/24 12:57:46 PM EDT

Possibly this week or next?

8/5/24 12:59:05 PM EDT

Is it still the group of people that were committed before or did that fall through?

8/5/24 12:59:33 PM EDT

+17176291559

Same plus add on

8/5/24 1:00:07 PM EDT

Ok. Good. Was hoping we didn't have start over.

8/5/24 1:01:42 PM EDT

What are you thinking in timing for my stock purchase and approx value?

8/5/24 1:02:25 PM EDT

+17176291559

I will work with you on when you want it and I'll try to be strong on price.  
I have some thoughts on o meet with you when you Caine back

8/5/24 1:02:36 PM EDT

Ok.

8/5/24 1:02:38 PM EDT

Thanks

8/6/24 8:21:46 PM EDT

Back in the states and Happy to meet any time to discuss this. Are you  
getting liquidity at this time when you do the refinance and this is a good  
time to make this happen or is this is a longer term process for you?

8/7/24 7:31:52 AM EDT

assume we are not having our 1:1 and annual review today unless I hear  
otherwise from you

8/7/24 8:13:40 AM EDT

+17176291559

Yes, but I'm ready to meet with you later this week

8/7/24 8:14:11 AM EDT

+17176291559

➔ Replying to you, 2024-08-06 20:21:46: « Back in the states and Happy  
to meet any time to discuss this. Are you getting liquidity at this time... »

No, it's happening Randall. I'm just not expressing it given how many  
times I failed you. They pulled off the final UC CC on Friday, which was  
holding it up as well.

8/7/24 8:14:25 AM EDT

ok. I will let Rose know

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.  
net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

8/7/24 8:18:06 AM EDT

Rose is out this week. When are you available to meet?

8/7/24 8:29:09 AM EDT

I'm available any time, evenings as well.

8/8/24 8:49:09 AM EDT

➔ Replying to you, 2024-08-07 08:18:06: « Rose is out this week. When are you available to meet? »

Just following up here. I will make anything work

8/9/24 6:41:56 AM EDT

Are we getting together today ?

8/9/24 6:49:16 AM EDT

Good morning by the way 😊

8/9/24 8:20:13 AM EDT

hello?

8/9/24 8:46:11 AM EDT

Also need to talk to you about Horizon gala sponsorship. They are asking for a financial commitment but we have no ability to do that at this time.

8/9/24 9:04:41 AM EDT

+17176291559

Good morning! Hang tight on schedule.

8/9/24 9:28:54 AM EDT

Liked "Good morning! Hang tight on schedule."

8/9/24 12:52:11 PM EDT

from our counsel regarding Sharenet

8/9/24 12:52:13 PM EDT

Randall,

I'm just catching up as I was out for a few days, myself. I have no update since my email on July 27th seeking further guidance from you and Daryl. I had understood that you were working on a new settlement proposal to make to Ray Davis that would be put the parties closer than the last exchange of settlement demands and offers that took place last year. If you need something from me to assist with that offer, please let me know ASAP.

If we are not able to make a good faith settlement offer at this point, then we really need to let opposing counsel know that an offer is not forthcoming and re-commence the litigation. The next phase would be us compelling further subpoena responses from Empower FCU. As we have discussed, based on my analysis and the additional information you provided about Empower's relationship with Fiserv, it seems that further discovery may not improve our position in the case. That is why I believe now is the time to make a settlement offer.

Opposing counsel has sat still expecting an offer. If we delay any further, we can expect that Davis's counsel will bring this delay to the attention of the Court. Our local counsel in New York, Dan Berman, has advised me that the judge will not be happy with the unexplained delay, and this may further hurt our position in the case.

Please let me know as soon as possible whether any settlement offer is forthcoming or if you need anything further from me to develop that offer. If there will be no offer, then I need to move the case forward with further discovery.

Devin

8/14/24 10:33:31 AM EDT

Daryl — we have no cash to pay our mortgage on the beach house — should I meet with a listing agent to put it on the market? I will be down there this weekend.

8/14/24 10:35:41 AM EDT

+17176291559

Def not. This funding will come in. Will have some later today.

8/14/24 10:36:47 AM EDT

Liked "Def not. This funding will come in. Will have so..."

8/15/24 6:44:33 PM EDT

Worried sick right now — not one thing you have said about funding coming in has come true and I'm desperately afraid that tomorrow we will not pay Clatworthy and from my perspective this is the last nail in the coffin. It's over if that occurs. Can you give me anything definitive?

8/15/24 7:12:35 PM EDT

Please respond.

8/15/24 7:25:21 PM EDT

Please call me.

8/15/24 7:26:15 PM EDT

+17176291559

I'm with Sam and Eric from ProVenture right now. I will respond.  
Apologies

8/15/24 7:34:12 PM EDT

Ok.

8/15/24 9:27:36 PM EDT

+17176291559

I'm still here

8/15/24 9:27:47 PM EDT

Ok.

8/15/24 11:31:32 PM EDT

+17176291559

I'm sorry. I will work through this. I expect funding release again tomorrow. Just getting out. I'm exhausted. Will hit you in morning

8/16/24 11:23:26 AM EDT

+17176291559

Have not hug up calls. Talking to John at 1130

8/16/24 11:23:47 AM EDT

Ok. I must talk to you.

8/16/24 12:31:36 PM EDT

+17176291559

Do you want me to talk to Dennis as well or just call you. I am don't with John

8/16/24 12:32:01 PM EDT

Yes. Both of us please

8/16/24 12:32:16 PM EDT

+17176291559

Calling in 5 minutes

8/16/24 12:32:24 PM EDT

Ok

8/16/24 12:36:29 PM EDT

From Steve , looking into this, but this is also not good

8/16/24 12:36:31 PM EDT

I just got off the phone with Bryan Bauer at CDS.

Starting today, they are withholding our daily surcharge. Their primary concern is that they are involved with month-end payouts that are not going out.

Due to the Cypress agreement being with PAI, they also notified PAI and are going to share information on which customers have not been paid.

He is going to follow up my conversation with him with an email

8/16/24 12:36:49 PM EDT

This is the substantial portion of our daily surcharge coming in

8/16/24 12:37:36 PM EDT

+17176291559

How could it be a substantial part of our surcharge when we're 500,000 a positive cash for a month and this revenue only represents about 33% of our revenue?

8/16/24 12:37:44 PM EDT

+17176291559

We need to stop Bryan from doing this. I need to call him.

8/16/24 12:37:58 PM EDT

Agreed apparently there's something in our agreement that all allows them to do that. We're trying to get the agreements will get legal involved.

8/16/24 12:38:11 PM EDT

This also involves PAI because they have a contract with them as well. We're trying to figure this

8/16/24 12:39:23 PM EDT

+17176291559

Can we talk now with Dennis?

8/16/24 12:39:25 PM EDT

+17176291559

Call me

8/16/24 12:39:38 PM EDT

Yes. Let me call Dennis

8/18/24 9:53:17 PM EDT

Just a reminder that While all of this is occurring I would like to cash out about half my stock as well depending on the price. Thanks

8/20/24 7:44:05 AM EDT

I need to speak to you asap this morning please.

8/20/24 7:54:58 AM EDT

Please prioritize this call.

8/21/24 2:05:44 PM EDT

Thinking of having Dennis take over as president at Paramount. I know you're probably against that, but I do feel very good about that in light of the recent events and how he's taken a real strong leadership position in the company. Open to discussion, but just thought I'd mention it



8/21/24 2:22:16 PM EDT

+17176291559

Totally for it!

8/21/24 2:28:32 PM EDT

Liked "Totally for it! "

8/21/24 3:03:19 PM EDT

Are you thinking of merging Margo and Paramount into one entity? If so, what are you thinking my role will be?

8/21/24 3:07:02 PM EDT

I'm OK with whatever

8/21/24 3:21:59 PM EDT

+17176291559

Not necessarily the strategy. I think there's a combined company down the road. It would be pulling you into Heller capital. You could also run the combined entity as I think you'd be capable, but I'm not sure that you want that responsibility. Again there's three different options here and we just need to talk through them.

8/21/24 3:22:14 PM EDT

ok

8/21/24 3:28:49 PM EDT

Liked "Not necessarily the strategy. I think there's a co..."

8/22/24 7:18:39 AM EDT

Good morning Daryl. I think it would be helpful if I share my thoughts with Dennis about this President role in the future. I need him to pick up where I sense Steve is checking out. Is it premature for me to discuss with him?

8/22/24 7:19:34 AM EDT

+17176291559

Not at all. Go for it. Given the chaos right now, his interest may not be high? May take a sit down with us three to reframe the future? Again, feel free to talk to him to get his response.

8/22/24 7:20:30 AM EDT

Ok. I think this actually might help him as it gives him something to focus on.

8/22/24 7:21:28 AM EDT

+17176291559

Loved "Ok. I think this actually might help him as it giv..."

8/22/24 11:53:32 AM EDT

just chatted with Dennis about this. He's 100% onboard and ready to go.

8/22/24 11:53:41 AM EDT

+17176291559

Loved "just chatted with Dennis about this. He's 100% onb..."

8/23/24 3:27:50 PM EDT

+17176291559

Did you resend the locations for FC as 250 and remove the two right column after ZIP Code?

8/23/24 3:28:15 PM EDT

yes. I attached it here but can send it to you by email now

8/23/24 3:28:48 PM EDT

+17176291559

Please email

8/23/24 3:30:03 PM EDT

should be in your inbox now

8/25/24 2:07:19 PM EDT

Just making sure you see the email that the legal counsel just sent us

8/25/24 2:07:36 PM EDT

Not sure I should be there to testify on anything as I don't know what's going on

8/25/24 2:07:53 PM EDT

And wouldn't to harm our case

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

8/25/24 2:10:50 PM EDT

+17176291559

Thanks, did not see it. But been communicating with Richard and Matt today.

Yes, you definitely do not need to be there

8/25/24 2:11:09 PM EDT

+17176291559

They asked me to respond with how the TRL would damage the business. I'm just gonna give them some bullet points quickly.

8/25/24 2:11:28 PM EDT

OK, thanks,

8/25/24 2:12:37 PM EDT

They are saying that you and I need to give affidavits so again not sure what help I'm gonna be in that situation

8/25/24 2:14:01 PM EDT

+17176291559

They said you and or I. We can just make it me.

8/25/24 2:14:20 PM EDT

Good. Thanks.

8/25/24 2:28:03 PM EDT

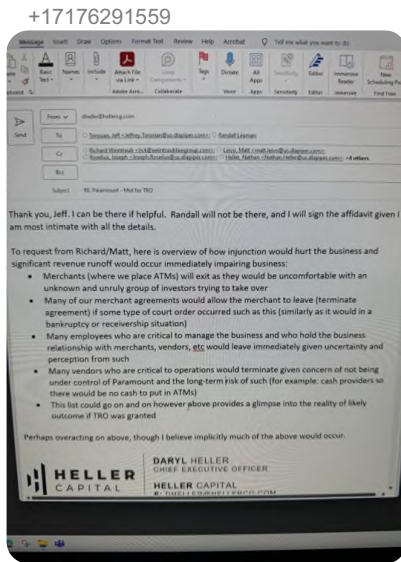
+17176291559

Anything you would add to this or change?

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

8/25/24 2:28:11 PM EDT



8/25/24 2:30:02 PM EDT

+17176291559

I'm likely being a bit extreme as the TRO would simply have us provide revenue and vendor payments through a process visible with a pornography however would be a concern and challenge

8/25/24 2:31:04 PM EDT

Yeah, I can't think of anything more to add to that list but agree that it would cause major problems for us .

8/25/24 2:31:26 PM EDT

+17176291559

I just added that the marketplace perception because of the tort interference has already occurred with our competitors could be quite destructive as well

8/25/24 2:31:48 PM EDT

Yes, and we have proof that our competitors are taking advantage of the situation

8/25/24 2:43:41 PM EDT

Unrelated — but don't forget that we need \$25k for beach house mortgage payment and cleaning expenses for the summer

8/25/24 2:43:49 PM EDT

By Friday.

8/25/24 2:45:31 PM EDT

+17176291559

No worries. We definitely have two settlements hitting tomorrow. The challenges we need 75K for the one. And then I need to figure out this retainer which they said they will pay back if it's not used by end of the week.

8/25/24 3:00:25 PM EDT

Liked "No worries. We definitely have two settlements hit..."

8/25/24 3:02:43 PM EDT

Any thoughts on when we offload Cypress?

8/25/24 3:44:47 PM EDT

+17176291559

I don't see that Sasha sent the letter. Did she send it to PAI? I sent her a response that I approved it.

8/25/24 3:45:28 PM EDT

I don't know. I will follow up

8/25/24 9:50:17 PM EDT

Daryl are you seeing all of the emails coming through from counsel?

8/25/24 9:50:27 PM EDT

are you reviewing and responding?

8/25/24 9:50:35 PM EDT

they want to get this stuff out tonight yet

8/25/24 9:51:49 PM EDT

sorry — yes. I see that you are responding. I should have read further in my email inbox

8/25/24 9:54:12 PM EDT

should I sign the engagement letter that they sent to me?

8/25/24 9:54:20 PM EDT

+17176291559

Yes

8/25/24 9:54:25 PM EDT

+17176291559

No

8/25/24 9:55:35 PM EDT

→ Replying to you, 2024-08-25 21:54:12: « should I sign the engagement letter that they sent to me? »

confused as to which of the responses applies to this message

8/25/24 9:58:37 PM EDT

+17176291559

The engagement letter was from yesterday. Just leave that go. Were they asking you to sign it tonight?

8/25/24 9:58:46 PM EDT

no

8/25/24 10:21:55 PM EDT

+17176291559

Did you see my affidavit? Is there anything in there that you think is not accurate regarding vendors?

8/25/24 10:22:42 PM EDT

No. The only place I paused was at the customer contract language that would prohibit this action

8/25/24 10:22:54 PM EDT

That felt like a stretch

8/25/24 10:23:34 PM EDT

+17176291559

What should change? We are just unsure the language of agreements?

8/25/24 10:23:43 PM EDT

Yes. They was my thought

8/25/24 10:23:49 PM EDT

Just unsure

8/25/24 10:57:40 PM EDT

+17176291559

Do you see them now? Just print sign and keep in your office as they don't need to be sent back.

8/25/24 10:58:45 PM EDT

Yes. I got them. You want me to print tonight and sign them?

8/25/24 11:01:37 PM EDT

+17176291559

Yes

8/25/24 11:01:44 PM EDT

Ok

8/25/24 11:02:26 PM EDT

Just print and sign and do nothing else?

8/25/24 11:03:45 PM EDT

+17176291559

Correct. Richard said internal

8/25/24 11:06:19 PM EDT

Liked "Correct. Richard said internal "

8/25/24 11:11:49 PM EDT

Done

8/25/24 11:13:54 PM EDT

they are asking me to sign the engagement letter. Should I do that?

8/25/24 11:14:31 PM EDT

+17176291559

Yea

8/25/24 11:15:00 PM EDT

ok

8/26/24 8:48:28 AM EDT

please see email from counsel — you need to sign immediately

8/26/24 8:48:59 AM EDT

you got it!

8/26/24 11:39:34 AM EDT

thinking of you and hoping all goes well with the hearing.

8/26/24 11:45:05 AM EDT

+17176291559

Loved “thinking of you and hoping all goes well with the ...”

Text message  
8/26/24 3:10:48 PM EDT

On pins and needles here. How did it go?

iMessage  
8/26/24 4:53:37 PM EDT

+17176291559

I had to testify for a couple hours. Insanity. I was told one hour max. I was not allowed to have a phone. We're still finishing up and just turning my phone on

8/26/24 4:53:49 PM EDT

+17176291559

No ruling, but we think it went well

8/26/24 4:54:00 PM EDT

Ok. Good to know. Thanks



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+17178242965, randall.leanman@gmail.com, dleanman@ptd.  
net, +17179175670, randall.leanman@paramountmgp.com, +17179172753

8/26/24 7:39:17 PM EDT

May I bring Steve, Derek, Dennis, and I over to your house tomorrow morning at 9:30 to talk about Paramount's future?

8/26/24 7:39:49 PM EDT

Or at least Dennis and me?

8/26/24 7:48:04 PM EDT

Actually, we're just gonna come over. We need to see you. We need to talk to you. We need to hear you at this point we deserve this from you

8/26/24 8:00:31 PM EDT

Just Dennis and me

8/27/24 8:48:20 PM EDT

<https://www.penguinair.com/blog/5-signs-you-have-a-gas-leak/>

8/27/24 8:48:21 PM EDT

Danger: 5 Signs You May Have a Gas Leak

8/28/24 7:31:26 AM EDT

we are going to need about \$31k in the beach house account for the mortgage, cleaning, maintenance and Evan's commission by the end of the week

8/28/24 11:18:15 AM EDT

+17176291559

I am seeing the listing of locations that have contracts but not the link to the contracts. Do you have the link to the contracts?

8/28/24 11:18:25 AM EDT

+17176291559

Eee to get to Chris

8/28/24 11:18:27 AM EDT

+17176291559

Need

8/28/24 11:18:35 AM EDT

Yes. Looking now

8/28/24 11:19:14 AM EDT

Please see your inbox

8/28/24 11:19:34 AM EDT

+17176291559

We did twice

8/28/24 11:19:47 AM EDT

I just resent

8/28/24 11:20:32 AM EDT

+17176291559

Got it, it does not allow me in so will not allow them in. I would also rename it superior project versus phonco project.

8/28/24 11:20:44 AM EDT

Ok. Hang on

8/28/24 11:21:09 AM EDT

+17176291559

Could she just send it in a zip File?

8/28/24 11:21:21 AM EDT

I will ask.

8/28/24 11:21:34 AM EDT

+17176291559

Do most of Phineco agreements auto renew?

8/28/24 11:22:51 AM EDT

Yes I believe so

8/28/24 1:38:58 PM EDT

Daryl — please see email I just sent to you with contracts and updated link. let me know if this works. I couldn't send zip file as it was too large

8/28/24 4:41:49 PM EDT

I think Dennis is resigning

8/28/24 4:42:04 PM EDT

He's done

8/28/24 4:43:49 PM EDT

+17176291559

Gracious. Something happened today?

8/28/24 4:44:12 PM EDT

No cash and reputational damage

8/28/24 4:44:58 PM EDT

He was hoping to get answers last night and satisfying but nothing definitive. He has nothing else lined up

8/28/24 4:45:25 PM EDT

He just can't take it anymore

8/28/24 4:45:45 PM EDT

Doesn't want to be an officer and ownership and just consult for us

8/28/24 4:46:22 PM EDT

He wants to consult for us

8/28/24 4:46:33 PM EDT

+17176291559

I'm trying hard

8/28/24 4:46:43 PM EDT

I'm tying this as I'm talking

8/28/24 4:46:48 PM EDT

+17176291559

Work as 1099

8/28/24 4:46:57 PM EDT

Yes. Maybe.

8/28/24 4:47:13 PM EDT

Worried about what is around the corner.

8/28/24 4:47:28 PM EDT

Afraid he is going to get drug into court

8/28/24 4:47:47 PM EDT

Family reputational damage

8/28/24 4:49:01 PM EDT

He is 44 and believes this will damage his future. Lawsuits

8/28/24 4:49:16 PM EDT

Believes his career is in jeopardy

8/28/24 4:49:25 PM EDT

Especially locally

8/28/24 4:49:46 PM EDT

He's taking about moving out of the area. He has eaten for two days

8/28/24 4:50:16 PM EDT

He wants removed from cap table and officer and into a consulting role.

8/28/24 4:50:33 PM EDT

Doesn't want to go through what you are going through

8/28/24 4:51:49 PM EDT

Just hung up with him

8/28/24 4:52:41 PM EDT

Can you talk?

Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

8/28/24 4:53:49 PM EDT

+17176291559

Trying to dump this call.

8/28/24 4:54:18 PM EDT

Ok. I have no plans tonight so happy to talk later

8/28/24 4:56:38 PM EDT

I'm at home

8/28/24 5:01:38 PM EDT

Happy to stop by or whatever

8/28/24 5:13:45 PM EDT

Thinking about this, he was a bit worried last week about all this, and as you know, was excited to become the president of Paramount, what I believe happened Is this lawsuit this past weekend completely rocked his world. He is a dyed in the wool Lancaster country club guy. His kids are friends with all those peoples friends and I think this he believes his reputation in this community that was ruined. Remember he is the "mayor".

8/28/24 5:14:13 PM EDT

+17176291559

I think you're right.

8/28/24 5:21:53 PM EDT

Also, I know the lack of Cypress payments has him freaked out as well. He's worried about lawsuits coming as a result of the actions we took to withhold the cash and as CFO that has direct bearing on him. I think if we had them current by the end of this week and he had some kind of assurances that there was no additional shoe to drop so to speak from investors he probably would feel a little bit differently about it.

8/28/24 5:22:12 PM EDT

He told me this on several occasions

8/28/24 5:23:10 PM EDT

He believes more lawsuits are coming and that he will be associated with this action

8/28/24 5:23:16 PM EDT

+17176291559

Do you want me to try to meet with him and talk him off the fence?

Or do we just look too use us to sell the company ASAP?

8/28/24 5:24:12 PM EDT

I'd be fine selling the company ASAP if we could do it

8/28/24 5:24:20 PM EDT

If he leaves, I think a lot of people follow him out the door

8/28/24 5:25:10 PM EDT

I think we're on the verge of that anyway because of our cash issues.

8/28/24 5:25:18 PM EDT

Especially in finance.

8/28/24 5:25:34 PM EDT

How quickly can we sell the company?

8/28/24 5:25:50 PM EDT

And will there be anything left afterwards for us?

8/28/24 5:26:45 PM EDT

But I think we're gonna have to fund it no matter what because if we don't, we will lose business and the company will shrink

8/28/24 5:27:34 PM EDT

I do think it's probably worth talking with him to get him off the fence so that he doesn't do anything drastic and jump at a job if somebody throws it to him

8/28/24 5:27:47 PM EDT

I'm also happy to meet as well with the two of you

8/28/24 5:30:49 PM EDT

I think right now there's a bit of a trust issue that he has with you simply because of the fact that you haven't come through on funding. He said that last night he was trying to get his head around how much money you had raised and how much needed to go pay the investors off and he didn't feel like he got concrete answers from you and feels uneasy about the whole funding situation. He said to me that you knew we needed money this week and even told us he would be getting it and now you're just working on it.

8/28/24 5:31:27 PM EDT

+17176291559

I totally understand and appreciate his frustration. It's been the most frustrating thing in my life as well.

8/28/24 5:32:24 PM EDT

Yes, I feel like if we can't pay people or get some funding by Friday, we are in trouble because we've been telling everybody that we would likely have it, even though there was no guarantee I think life becomes more difficult very quickly

8/28/24 5:32:46 PM EDT

+17176291559

Did he officially resign or just say that he's going to resign?

8/28/24 5:33:46 PM EDT

He didn't officially resign. He said he wants to get off the cap table and wants to not be an officer and wants to be in consultant 1099.

8/28/24 5:34:14 PM EDT

He said he has no other job lined up and he knows that this is not the right move, but he can't see any way forward. I think he does the consulting thing until he figures out a new job and likely moves his family out of the.

8/28/24 5:34:19 PM EDT

Area

8/28/24 5:35:21 PM EDT

He said he and his wife talked about it all last night because he didn't get any sleep

8/28/24 5:38:09 PM EDT

How quickly can we sell Paramount?

8/28/24 6:04:59 PM EDT

I owe him a call back tonight. He asked me to call him back after I chatted with you so we need some time to talk.

8/28/24 6:06:33 PM EDT

+17176291559

I'm working through things with Brandon at true right now.

On/off w legal nonstop

8/28/24 6:06:55 PM EDT

Understood

8/28/24 6:08:07 PM EDT

The more I think about it as I'm walking selling Paramount solves all of his problems right because it pays all the investors off gets him out of his position. Hopefully, we have some money left over that afford him some time to figure out what he wants to do next.

8/28/24 6:09:10 PM EDT

Then maybe he and I jump over and run Margo for a while or something like that unless you're gonna try to sell everything at one time

8/28/24 6:09:14 PM EDT

+17176291559

I would sell it in a heartbeat right now. Just to get the investor payoff use some money. I don't need anything out of it other than a few bucks.

8/28/24 6:09:19 PM EDT

+17176291559

Agreed on Margo

8/28/24 6:09:54 PM EDT

How quickly can we strike a deal and get this done? Can We sell the current investor group since they have somebody lined up like Jeffery?



8/28/24 6:10:37 PM EDT

I know I need a substantial payoff. I've never had a payday. And I really would like to show something for the last 12 years of my life.

8/28/24 6:12:24 PM EDT

Or do we go to David Dove since he gets stroke a check pretty quickly

8/28/24 6:21:53 PM EDT

Do we let prestige take over stroke us a check now to cover the 5 million we need to get solvent. And I guess they'd have to buy out any other investors outside of prestige potentially, and then give us a some checks to cover our equity in the business.

8/28/24 6:22:34 PM EDT

Just thinking as I'm walking, that's all

8/28/24 6:22:53 PM EDT (Edited 8/28/24 6:23:16 PM EDT)

My guess is they will probably trip if they see the numbers because they think it's doing way more than what it is

Edited

8/28/24 6:47:50 PM EDT

+17176291559

I don't see a path with Prestige. I think it will just cause more problems and more lawsuits as the more information they get the more they just wanna change course and go after additional things. It would just complicate it. Turning over location, agreements could work for certain locations as we don't owe them any financials based on what we committed to give

8/28/24 6:48:34 PM EDT

Yeah, that's what I thought after I put it out there

8/28/24 6:48:55 PM EDT

What are your thoughts and who we would sell it to?

8/28/24 6:53:30 PM EDT

does putting it up for sale help quiet the investors?

8/28/24 6:53:49 PM EDT

make it easier to navigate this or no?

8/28/24 6:54:08 PM EDT

+17176291559

I think Athena and Komodo would pay big dollars for it right now

I think PAI and David Dove would do the same

I think cord would be a buyer

And many PE?

8/28/24 6:54:37 PM EDT

+17176291559

It actually may we put it up an offered a high percentage of the proceeds to them. I would then give you a high percentage of what we don't give them.

8/28/24 6:54:52 PM EDT

+17176291559

I'm on calls so slow in responding

8/28/24 6:55:02 PM EDT

no worries. I understand.

8/28/24 6:55:42 PM EDT

so regardless, we need funding to live to see the sale. What is this a six month process?

8/28/24 6:57:15 PM EDT

+17176291559

No, this could be really fast. And if we work with someone like David Dove, we could probably get him to put an amount up in escrow collateralized by the company that we could use as operating.

8/28/24 6:57:29 PM EDT

+17176291559

Meaning next week for that. I think the deal could close in two months if it's a strategic buyer. Even faster if we wanna expedite a sale.

8/28/24 6:58:04 PM EDT

we need to get customers paid now so I don't know that we can even wait a week.

8/28/24 6:58:58 PM EDT

so we need to pay investors, acquisition partners, and Samantha — wonder how much would be left?

8/28/24 6:59:11 PM EDT

and Ray Davis

8/28/24 6:59:30 PM EDT

+17176291559

I think there could be a material amount. Like I said, I'm gonna give you first dibs

8/28/24 6:59:47 PM EDT

thank you

8/28/24 7:02:35 PM EDT

the dream number in my head is \$10M — (I have \$7.2M in basis)

8/28/24 7:02:40 PM EDT

unrealistic?

8/28/24 7:03:08 PM EDT

+17176291559

I'm tied up on calls. I'm not sure how to respond to Dennis. I realize he was looking for definitive commitments as you are and the minute I make them submit I put myself at risk. I'll respond more later.

8/28/24 7:04:24 PM EDT

yep. understand

8/28/24 7:06:10 PM EDT

I told Dennis that we had an idea that we were bouncing around that I think would work for him. Told him I'm pinging you and that you are slow to respond but that we will reach out to him to talk.

8/28/24 7:06:14 PM EDT

he understood.

8/28/24 7:20:53 PM EDT

did you reach out to Tommy and Joe? worried about their silence.

8/28/24 7:25:00 PM EDT

also, Nestor is waiting for you to respond

8/28/24 7:25:32 PM EDT

+17176291559

I had respond to Tommy and Joey. I told him to be patient and maybe I'll hand-deliver a check tomorrow and they gave me heart signs

8/28/24 7:25:40 PM EDT

Laughed at "I had respond to Tommy and Joey. I told him to be ..."

8/28/24 7:30:56 PM EDT

Also, we need to see release from Superior — we are all worried that this will go through on us personally.

8/28/24 7:35:00 PM EDT

+17176291559

The link you sent me would not open. It asked for a password. What is the password?

8/28/24 7:35:12 PM EDT

+17176291559

This is the second link. I talked to Chris and told him the password is not working again.

8/28/24 7:35:21 PM EDT

+17176291559

Can she send it with a password?

8/28/24 7:37:29 PM EDT

the password is on the email

8/28/24 7:38:06 PM EDT

+17176291559

Sorry I missed it. Even looked.

8/28/24 7:38:28 PM EDT

no worries. you have alot on your mind.

8/28/24 7:55:59 PM EDT

are you good to sell the company or would you like some time to think about it? thought I might mention it to Dennis if you thought that this was the right direction.

8/28/24 7:56:15 PM EDT

i will wait till tomorrow

8/28/24 8:04:42 PM EDT

+17176291559

➔ Replying to you, 2024-08-28 19:55:59: « are you good to sell the company or would you like some time to think about it? thought I might mentio... »

I'm totally good selling it right now

8/28/24 8:05:05 PM EDT

cool. the sooner the better in my mind.

8/28/24 8:06:45 PM EDT

	Sum of amount	Add 5%	Amount
BTM Vending	\$ 124,545.61	\$ 130,772.89	\$ 130,772.89
Digital Music Systems	\$ 118,414.00	\$ 124,334.70	\$ 124,334.70
Pride Vending NW	\$ 309,417.68	\$ 324,888.56	\$ 324,888.56
			\$ 579,996.15

8/28/24 8:07:09 PM EDT

these are the screamers at Cypress — will you ask David Dove to release these payments?

8/28/24 8:14:42 PM EDT

just hold on this a minute. we may want to make a change

8/28/24 8:20:19 PM EDT

actually, this is the right list

8/28/24 9:22:41 PM EDT

So just to be clear, if we notify the investors that the company is now up for sale, that stops the lawsuits?

8/28/24 9:22:54 PM EDT

Makes Dennis life easier?

8/29/24 6:32:39 AM EDT (Edited 8/29/24 6:32:59 AM EDT)

Good morning Daryl. As much as I hate to say this but Dave Charles may be our only hope here. He could write a check to us by tomorrow and buyout the company next week.

Edited

8/29/24 6:43:38 AM EDT

I think the Jerry lawsuit is going to give everyone pause and take more time to evaluate and we are out of time.

8/29/24 6:48:10 AM EDT

+17176291559

➔ Replying to you, 2024-08-28 21:22:41: « So just to be clear, if we notify the investors that the company is now up for sale, that stops the la... »

Hung up my last call at 12:33 AM this morning so apologize I did not get back

8/29/24 6:49:05 AM EDT

No worries.

8/29/24 6:51:16 AM EDT

+17176291559

➔ Replying to you, 2024-08-28 21:22:41: « So just to be clear, if we notify the investors that the company is now up for sale, that stops the la... »

I've been processing this. I think one of the reasons they tried to get the adjunction so that we could not get rid of all the assets. I think in one way this could slow things down in another way. It could create more concern. The biggest challenges many of our Atm's are owned by the fun so we need to buy them back at the same time.

I wonder if we could position a piece of the business such as the affiliate business only to Dave Charles a step one of a two step process

8/29/24 6:52:04 AM EDT

➔ Replying to you, 2024-08-28 21:22:41: « So just to be clear, if we notify the investors that the company is now up for sale, that stops the la... »

Yes. Actually David dove might buy that

8/29/24 6:52:22 AM EDT

➔ Replying to you, 2024-08-28 21:22:41: « So just to be clear, if we notify the investors that the company is now up for sale, that stops the la... »

He has all of the economics.

8/29/24 6:52:57 AM EDT

➔ Replying to you, 2024-08-28 21:22:41: « So just to be clear, if we notify the investors that the company is now up for sale, that stops the la... »

Any luck on the funding from your side?

8/29/24 6:55:28 AM EDT

+17176291559

Could we put together a one pager on the economics just profile overview that business? Total ATMs total revenue the last few months total margin, etc. they one pager with the economics as well.

8/29/24 6:55:49 AM EDT

Yes.

8/29/24 6:56:10 AM EDT

+17176291559

I'm going to try to talk to Charles this morning if we can get this quick summary overview

8/29/24 6:56:35 AM EDT

Ok

8/29/24 6:58:19 AM EDT

Any luck on funding from your side or are they baling on us ?

8/29/24 6:58:36 AM EDT

So then, I think we just turn over all the portfolios to the investors Friday or Tuesday and just walk away

8/29/24 6:59:05 AM EDT

+17176291559

I just sent a message to David

8/29/24 6:59:10 AM EDT

Ok

8/29/24 7:00:22 AM EDT

+17176291559

➔ Replying to you, 2024-08-29 06:58:19: « Any luck on funding from your side or are they bailing on us ? »

Not bailing, but switching gears and removing the syndicate just doesn't happen in a couple hours. I'm hopeful we may be able to get one of the two funded tomorrow. I've reviewed the lawsuits w them and tried to overcome that which I think I have

8/29/24 7:00:46 AM EDT

Ok.

8/29/24 7:04:30 AM EDT

We've been throwing away ATMs at the warehouse. Should we stip?

8/29/24 7:04:34 AM EDT

Stop?

8/29/24 7:10:12 AM EDT

Should I meet with realtor for beach house?

8/29/24 7:11:37 AM EDT

+17176291559

When you say throwing away, you're getting scrap metal costs?

Yes, I think we should stop until this calms has some of those are tied into non-depreciation funds. Do you have any idea how many we got rid of?



8/29/24 7:12:08 AM EDT

We found someone to haul away for free.

8/29/24 7:12:37 AM EDT

No idea how many we got rid of but we have documentation on what we got rid of.

8/29/24 7:12:47 AM EDT

Photos and serial numbers.

8/29/24 7:29:02 AM EDT

➔ Replying to you, 2024-08-29 07:10:12: « Should I meet with realtor for beach house? »

I'm going down there this afternoon. Should I get the ball rolling here?

8/29/24 7:29:23 AM EDT

We have mortgage payment due by the first

8/29/24 7:41:38 AM EDT

+17176291559

➔ Replying to you, 2024-08-29 07:10:12: « Should I meet with realtor for beach house? »

No I don't think so.

8/29/24 7:42:30 AM EDT

Did you get Steve Dennis and me dropped from lawsuit ?

8/29/24 8:04:16 AM EDT

Or did you get an extension? If so please send copies of this asap.

8/29/24 8:05:04 AM EDT

+17176291559

Yes, and he will. he's on his boat up in the peninsula and has limited service, but I chatted with him late afternoon again again. He has always delivered on these.

8/29/24 8:05:14 AM EDT

Ok.

8/29/24 8:05:32 AM EDT

+17176291559

David Charles just responded. He can talk at 9:15 central which is 1015 our time. Can you please get me a one or two pager by then with a snapshot of the economics. Just a quick summary. One or two page

8/29/24 8:06:10 AM EDT

Yes. On it.

8/29/24 8:11:47 AM EDT

are you bringing any cash in today

8/29/24 8:14:38 AM EDT

acquisition partners will want to know how they are getting handled in this process if we unload

8/29/24 8:15:51 AM EDT

+17176291559

This would allow us to catch them up and then Dave takes over. Pay Samantha negotiated settlement and take the rest of the cash.

8/29/24 8:16:07 AM EDT

ok

8/29/24 8:16:42 AM EDT

right — what I meant is that if we turn over portfolios to investors, they won't participate in third financial event

8/29/24 8:17:03 AM EDT

because there is none

8/29/24 8:17:45 AM EDT

+17176291559

I'm just talking about the Cypress business only to Dave Charles. There is no financial event in the Samantha deal.

8/29/24 8:17:51 AM EDT

right.

8/29/24 8:17:56 AM EDT

I'm talking everything else

8/29/24 8:18:40 AM EDT

+17176291559

If we get a significant amount of dollars from Dave Charles, it would set the company back up on its feet and it would give us a little breathing room to get this out to take place. We could also probably drop some headcount.

8/29/24 8:18:53 AM EDT

yep. ok

8/29/24 8:20:25 AM EDT

I plan to turn in my truck next week. I will get them to write me a check

8/29/24 8:20:45 AM EDT

+17176291559

You don't have to do that, you don't have a another vehicle. I would not do that.

8/29/24 8:21:05 AM EDT

I do have another vehicle. My wife's car and son's car

8/29/24 8:21:13 AM EDT

I will drive either of those.

8/29/24 8:21:47 AM EDT

I'd like to pay down my personal credit card with this. I'm owed \$125k by the company

8/29/24 8:21:54 AM EDT

current amount outstanding.

8/29/24 8:28:51 AM EDT

do we have any ATM business that is not pledged to investors other than Cypress?

8/29/24 8:30:25 AM EDT

+17176291559

Yes, it's not all. None of its pledge. They just have the ATMs that we can buy out.

8/29/24 8:31:23 AM EDT

yes. I misspoke. just wondering if we have a core business left if we need to hand over assets to them. Should we split them out into a separate company now?

8/29/24 8:31:52 AM EDT

+17176291559

Yea but need to reconcile through it

8/29/24 8:31:56 AM EDT

ok

8/29/24 8:32:15 AM EDT

+17176291559

We can buy all the ATMs back for fair market value or not renew the contracts for things beyond 36 months so in those cases, we get them back for virtually zero dollars.

8/29/24 8:32:42 AM EDT

cool.

8/29/24 8:32:56 AM EDT

just thinking about options.

8/29/24 8:37:29 AM EDT

so -- worst case scenario — 1. Sell Cypress, 2. turn over any ATM to investor that still has a balance, 3. create a small ATM company that is profitable and continues. Best case scenario 1. Sell Cypress 2. Sell Paramount

8/29/24 8:49:30 AM EDT

this is what I'm presenting to Dennis. Am I missing something?

8/29/24 9:41:06 AM EDT

Daryl do my scenarios seem right to you? i want to call Dennis to talk about this.

8/29/24 9:44:15 AM EDT

+17176291559

I think the merging of Margot were bringing those assets into some thing is a third scenario

8/29/24 9:44:26 AM EDT

right. didn't think of that.

8/29/24 9:45:57 AM EDT

are you bringing in any funding today? If so, how much?

8/29/24 9:49:02 AM EDT

+17176291559

I'm doing everything possible, Randall. It's very painful.

8/29/24 9:55:44 AM EDT

one pager for cypress is in your inbox

8/29/24 11:01:56 AM EDT

any interest from Dave Charles?

8/29/24 11:09:44 AM EDT

+17176291559

Send him NDA. Waiting for him to execute.

8/29/24 11:09:55 AM EDT

+17176291559

He was trying to do it without the NDA. I'm gonna call him in an hour if I don't hear back.

8/29/24 11:10:09 AM EDT

Ok

8/29/24 12:10:23 PM EDT

anything out of Dave?

Messages - +17176291559

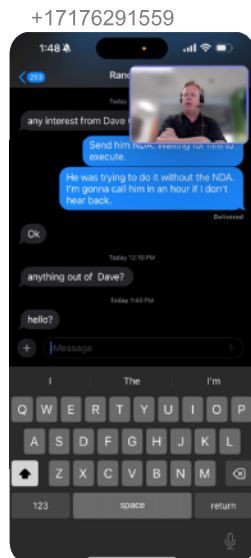
Certification in Support Page 242 of 810

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

8/29/24 1:46:51 PM EDT

hello?

8/29/24 1:49:28 PM EDT



8/29/24 1:50:07 PM EDT

I don't know who that is?

8/29/24 1:56:56 PM EDT

+17176291559

Not paying that legal bill. I will negotiate with them. They want to do prelim work and they need to standstill until we know that we need them more.

8/29/24 1:57:01 PM EDT

+17176291559

Walking to Charles now

8/29/24 1:57:26 PM EDT

Did you weintraub resigned ?

8/29/24 1:57:45 PM EDT

Walking?

8/29/24 1:58:26 PM EDT

Conflict of interest

8/29/24 2:08:03 PM EDT

➔ 2024-08-29 13:56:56: « Not paying that legal bill. I will negotiate with them. They want to do prelim work and they need to standstill until ... »

Good. I had sticker shock on that

8/29/24 2:11:46 PM EDT

+17176291559

Really good call with David Charles. He called me back in a few hours. He actually he could do a deal incredibly quick.

8/29/24 2:12:11 PM EDT

Great! Can we get cash tomorrow?

8/29/24 2:12:33 PM EDT

How much did he offer?

8/29/24 2:12:58 PM EDT

Is he aware that time is of the essence as these customers will be walking soon?

8/29/24 2:13:37 PM EDT

+17176291559

He refused to put a number to. He knows we paid 15 16 million for it. He said he's not gonna pay close to that if it's cash and a close deal. I think we'd be fortunate to get 10 to 12,000,000 but if you think about the utility that cash and get this weight off our shoulders, it could go along way.

8/29/24 2:13:53 PM EDT

Oh man would it ever.

8/29/24 2:14:19 PM EDT (Edited 8/29/24 2:14:33 PM EDT)

How quickly can we get cash?

Edited

8/29/24 2:16:05 PM EDT

Cypress customers are livid

8/29/24 2:43:57 PM EDT

+17176291559

I think it would be easy to get 1.5m downstroke from Dave cover them

8/29/24 2:44:05 PM EDT

+17176291559

I presume David Dove never responded to anyone on email

8/29/24 2:44:27 PM EDT

No response at all

8/29/24 2:44:57 PM EDT

I wonder if he's supporting the legal bill for Jerry?

8/29/24 2:45:03 PM EDT

Dove that is

8/29/24 2:45:49 PM EDT

+17176291559

Hmmmm

8/29/24 2:49:18 PM EDT

I may be wrong, but just popped into my brain

8/29/24 3:03:35 PM EDT

Don't forget to respond to Nestor. We need to keep Puerto Rico going.

8/29/24 3:26:41 PM EDT

Also just a reminder that we have Clatworthy on Tuesday that we need to pay and following that is payroll.

8/29/24 4:44:07 PM EDT

Hello Daryl, just checking in any good word or relief insight? :-)

8/29/24 5:56:27 PM EDT

Hey Daryl, saw the legal letter. Is Gerry gearing up for another challenge? If so why don't we hand them their terminals for their locations and stop this nonsense.

8/29/24 6:04:41 PM EDT

+17176291559

Did not see it



8/29/24 6:10:25 PM EDT

It is an email from Jeff Torosian

8/29/24 6:11:15 PM EDT

Daryl just got an email from our sponsor bank, they're wanting feedback on the litigation. I will respond but just letting you know this could be very bad for us if it doesn't go

8/29/24 6:13:12 PM EDT

+17176291559

➔ Replying to you, 2024-08-29 18:10:25: « It is an email from Jeff Torosian »

No, he's just scaring up for litigation because he wants money

8/29/24 6:15:34 PM EDT

OK, that's what I thought. Just wanted to be sure.

8/29/24 6:15:53 PM EDT

+17176291559

Mow over the funding. Going to talk to Charles again tonight. Had a conversation with true and hour ago.

8/29/24 6:17:05 PM EDT

+17176291559

Can you send me Yolanda's phone number that Krys you can call her as he cannot open the PDF and neither can o.

You need to call her and let her know she can share no information with Krys or any of his people and just show them the contracts and let her know that if she has any questions relative to the Atm contract and why we assigned these locations theyneeds to talk to me. At this point, they simply want to be able to access the PDF and I do not think they were ask her questions but please call her and advise.

8/29/24 6:17:10 PM EDT

+17176291559

Can you send me her name and number right here?

Messages - +17176291559

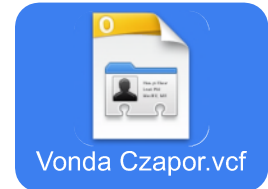
+17178242965, randall.leanan@gmail.com, dleanan@ptd.  
net, +17179175670, randall.leanan@paramountmvp.com, +17179172753

8/29/24 6:17:15 PM EDT

+17176291559

I need a text to Krys

8/29/24 6:20:06 PM EDT



8/29/24 6:20:06 PM EDT

Vonda Czapor

8/29/24 6:25:50 PM EDT

I texted her the information and let her know

8/29/24 6:30:55 PM EDT



8/29/24 6:30:55 PM EDT

Screenshot 2024-08-29 at 6.30.48 PM

8/29/24 6:33:41 PM EDT

Daryl hang on this is going to turn into a circus and I don't want it to be. Apparently avail is the one who created the link folder. They have no idea about this.

8/29/24 6:34:24 PM EDT

Maybe I can just email several at a time to him. If you get his email number send it to me I will pick up maybe 10 at a time and send them to him. How many does he want to see? I wanna see all of them?

8/29/24 7:03:33 PM EDT

From Dennis regarding Cyprus

8/29/24 7:03:35 PM EDT

Not sure where he's seeing that but July was biggest GP month at \$250K. We bought at \$215K GP and it's been averaging that or above. Seasonality could be a factor but would need check input

8/30/24 6:05:47 AM EDT

Good morning Daryl — any updates on True funding ? Does it look like this will come through or are they pulling back?

8/30/24 6:15:12 AM EDT

Also any cash for the beach house mortgage payment?

8/30/24 7:24:41 AM EDT

Daryl — I emailed the contracts for Superior to you. Rose can forward them to whomever. By the way, looks like we are missing 14 contacts but the team responsible for these is out for the holiday. I will get them for you on Tuesday unless they respond while they are on vacation.

8/30/24 7:31:34 AM EDT

+17176291559

➔ Replying to you, 2024-08-30 06:05:47: « Good morning Daryl — any updates on True funding ? Does it look like this will come through or are ... »

I am full bore with it. I don't know if it's gonna hit today. I'm hoping for some type of miraculous element with Charles or this morning.

8/30/24 7:31:39 AM EDT

+17176291559

➔ Replying to you, 2024-08-30 06:05:47: « Good morning Daryl — any updates on True funding ? Does it look like this will come through or are ... »

I can talk to your team if you want

8/30/24 7:31:57 AM EDT

+17176291559

➔ Replying to you, 2024-08-30 06:05:47: « Good morning Daryl — any updates on True funding ? Does it look like this will come through or are ... »

Charles will take care of cash connect and merchants

8/30/24 7:32:34 AM EDT

Ok. May need you to do that.

8/30/24 7:33:36 AM EDT

may need rose to email Cypress merchants from you with the following if we are not going to pay them today

8/30/24 7:33:38 AM EDT

To our Cypress Affiliates:

This message is to let you know, directly from me, that we are not going to meet today's scheduled payments to you. We had every reassurance, as we communicated to you last week, that we would be able to get those payments sent out today. Unfortunately, that's not going to happen.

I know this is a vital matter to each of you, and please know that it is our top concern as well. We are determined to get this resolved as quickly as possible. We highly value our relationship with you and while this is not the message you wanted to receive from us, it is important that we keep you informed as we work to resolution.

We appreciate the patience and understanding that many of you have shown, in spite of the frustration and concern we know you are feeling.

I'm confident we can get this resolved quickly and will keep you updated.

DH

8/30/24 7:34:15 AM EDT

+17176291559

➔ Replying to you, 2024-08-29 18:34:24: « Maybe I can just email several at a time to him. If you get his email number send it to me I will pick... »

Somehow, I missed this last night as I was in meetings. I had forwarded out Wanda's number. Just tell her not to give him anything. A few email contracts that works. So you just want me to forward email contracts?

8/30/24 7:34:27 AM EDT

yes

8/30/24 7:34:36 AM EDT

+17176291559

➔ Replying to you, 2024-08-29 18:33:41: « Daryl hang on this is going to turn into a circus and I don't want it to be. Apparently avail is the... »

What does this mean, that we gave bad information?

8/30/24 7:34:37 AM EDT

I emailed all to you moments ago

8/30/24 7:34:52 AM EDT

no. the links didn't work

8/30/24 7:35:07 AM EDT

and I didn't want him to get frustrated dealing with people in our office

8/30/24 7:35:18 AM EDT

+17176291559

➔ Replying to you, 2024-08-30 06:15:12: « Also any cash for the beach house mortgage payment? »

What is the minimum needed for the beach house payment? Due today or September 1.

8/30/24 7:35:36 AM EDT

that said, we are 14 contracts short of the numbers we provided to him

8/30/24 7:36:06 AM EDT

+17176291559

So the link does not work? And forward the contract you sent me.

8/30/24 7:36:32 AM EDT

correct. the link doesn't work for me now either

8/30/24 7:36:49 AM EDT

and forward the contracts in the emails I just sent to you. Should be 24 of them

8/30/24 7:37:11 AM EDT

+17176291559

So only 24? He will want all 250 yards many as we can get.

8/30/24 7:37:35 AM EDT

236 contracts in 24 emails

8/30/24 7:37:41 AM EDT

we are missing 14.

8/30/24 7:38:05 AM EDT

+17176291559

That works

8/30/24 7:38:06 AM EDT

if he can't wait, I can try to get someone to pull together 14 more but the two people I'm working with are on vacation today

8/30/24 7:42:55 AM EDT

please respond to Nestor-- he wants to know where and when to meet you today

8/30/24 7:48:07 AM EDT

Emphasized "please respond to Nestor-- he wants to know where ..."

8/30/24 8:08:33 AM EDT

Daryl?

8/30/24 8:47:32 AM EDT

Daryl Nestor getting frustrated that you're not responding will you please respond to him about a time and place?

8/30/24 9:07:37 AM EDT

Daryl regarding the contracts for superior the reason there are only 236 contracts is that some of the contracts have multiple TIDs so there are still 250 locations on those contracts

8/30/24 9:17:25 AM EDT

Can I forward Dennis email to Erin to take care of?

8/30/24 9:33:07 AM EDT

We need 23k for mortgage payment for auto deduct on Tuesday

8/30/24 9:33:52 AM EDT

21,300 for mortgage and balance to house cleaner

8/30/24 11:55:12 AM EDT

**From Jeffery Torosian**

Resending my note below since I don't believe you can receive or hear the voicemail I received. Of note,

- The reporter who was in the courtroom is calling asking for comment
- We won't respond and won't comment
- He said he's getting more calls on his article than he's ever received on an article
- He said the calls are from investors in the Plaintiffs and they're saying you're running a ponzi scheme
- He said he's writing a short article today just saying that the judge denied the TRO

Jeffrey S. Torosian

8/30/24 12:32:18 PM EDT

Sorry to hit you so much, Daryl but I need to know if you're getting funding today otherwise we need to send that email from Rose from you to the Cypress customers letting them know that we're not paying them today

8/30/24 12:32:31 PM EDT

➔ Replying to you, 2024-08-30 07:33:38: « To our Cypress Affiliates:

This message is to let you know, directly from me, that we are not going t... »

This one

8/30/24 12:43:55 PM EDT

+17176291559

➔ Replying to you, 2024-08-30 07:33:38: « To our Cypress Affiliates:

This message is to let you know, directly from me, that we are not going  
t... »

On calls

8/30/24 12:44:03 PM EDT

+17176291559

➔ Replying to you, 2024-08-30 07:33:38: « To our Cypress Affiliates:

This message is to let you know, directly from me, that we are not going  
t... »

How much I owed Tommie

8/30/24 12:44:25 PM EDT

+17176291559

➔ Replying to you, 2024-08-30 07:33:38: « To our Cypress Affiliates:

This message is to let you know, directly from me, that we are not going  
t... »

Do we have money to pay his commission ACH

8/30/24 1:18:45 PM EDT

Daryl, the Cyprus customers are wild! Getting text messages and emails

8/30/24 1:18:57 PM EDT

Can we send this out from you through Rose?

8/30/24 1:19:17 PM EDT

Email communication I mean?

8/30/24 1:35:48 PM EDT

+17176291559

Trying to find the communication. Where is it?



8/30/24 1:36:01 PM EDT

+17176291559

➔ Replying to you, 2024-08-30 07:33:38: « To our Cypress Affiliates:

This message is to let you know, directly from me, that we are not going t... »

Got it

8/30/24 1:36:42 PM EDT

+17176291559

➔ Replying to you, 2024-08-30 07:33:38: « To our Cypress Affiliates:

This message is to let you know, directly from me, that we are not going t... »

So this is just going to 10 different people?

8/30/24 1:37:01 PM EDT

➔ Replying to you, 2024-08-30 07:33:38: « To our Cypress Affiliates:

This message is to let you know, directly from me, that we are not going t... »

Yeah, maybe 12 to 15 I don't think more than that

8/30/24 1:37:11 PM EDT

➔ Replying to you, 2024-08-30 07:33:38: « To our Cypress Affiliates:

This message is to let you know, directly from me, that we are not going t... »

The largest accounts

8/30/24 1:37:16 PM EDT

+17176291559

➔ Replying to you, 2024-08-30 07:33:38: « To our Cypress Affiliates:

This message is to let you know, directly from me, that we are not going t... »

Can you email this to me so I can make a couple quick changes?

8/30/24 1:37:48 PM EDT

➔ Replying to you, 2024-08-30 07:33:38: « To our Cypress Affiliates:

This message is to let you know, directly from me, that we are not going t... »

Yes, in your inbox now

8/30/24 1:59:50 PM EDT

Did you get a chance to modify this?

8/30/24 2:01:08 PM EDT

+17176291559

Minutes

8/30/24 2:12:22 PM EDT

+17176291559

Talking to David Charles and a couple minutes in the event you want to wait

8/30/24 2:12:39 PM EDT

Ok.

8/30/24 2:34:32 PM EDT

+17176291559

I think he's gonna do a deal but you can send the email. You may just want to state that we will have a definitive timeline Tuesday and we expect it early in the week.

8/30/24 2:34:38 PM EDT

+17176291559

I would not Mass send that out just to the few people we haven't paid

8/30/24 2:34:50 PM EDT

Right

8/30/24 2:34:53 PM EDT

+17176291559

If you don't like my language about some of our surcharge, not coming through to us, you can change it, but I thought that was reality as we'd be using that six 700 K to make these payments right now

8/30/24 2:35:25 PM EDT

Ok

8/30/24 2:56:44 PM EDT

how is it going with True. Likely to get cash from them next week?

8/30/24 3:09:50 PM EDT

+17176291559

Just misaed David call and gir this

8/30/24 3:09:54 PM EDT

+17176291559

Call me when you can just need to verify a couple of issues. How many are affiliates? How many are retail? What switches are being used? How many on each switch think we can make this move quickly?

8/30/24 3:13:09 PM EDT

I will find out

8/30/24 3:20:35 PM EDT

All ATMs are tied to an affiliate —  
~97% are on CDS, remaining are FIS - both via contract with PAI with 30 day out.

8/30/24 4:34:13 PM EDT

➔ Replying to you, 2024-08-30 14:56:44: « how is it going with True. Likely to get cash from them next week? »

Any thoughts on this?

8/30/24 5:10:30 PM EDT

Mortgage payment auto drafts on Tuesday.

8/30/24 5:10:49 PM EDT

+17176291559

Been on with Charles for the last hour.

8/30/24 5:10:53 PM EDT

+17176291559

Working on true

8/30/24 5:11:25 PM EDT

Ok. That is still moving forward?

8/30/24 5:11:30 PM EDT

True?

8/30/24 5:11:36 PM EDT

+17176291559

Yea!

8/30/24 5:11:40 PM EDT

Good

8/30/24 5:22:02 PM EDT

Did we get released from the superior lawsuit?

8/30/24 10:35:21 PM EDT

[https://lancasteronline.com/news/local/judge-denies-emergency-control-request-in-lancaster-based-atm-network-case/article\\_35223f10-6710-11ef-aa5e-f76a05736b8b.html](https://lancasteronline.com/news/local/judge-denies-emergency-control-request-in-lancaster-based-atm-network-case/article_35223f10-6710-11ef-aa5e-f76a05736b8b.html)

8/30/24 10:35:21 PM EDT

**LNP | LancasterOnline: Judge denies emergency control request in Lancaster-based ATM network case**

Judge denies emergency control request in Lancaster-based ATM network case

8/30/24 10:35:29 PM EDT

Assuming you saw this.

8/30/24 10:51:21 PM EDT

+17176291559

Yes, there's a smear campaign going on. I've had a friend called the paper and the paper told him that they've had countless investors calling and speaking negative, and they sense strategic and orchestrated.

8/30/24 10:51:36 PM EDT

+17176291559

Have people begging for me to tell my story

8/30/24 10:52:10 PM EDT

Yeah. Doesn't seem fair.

8/31/24 5:49:05 AM EDT

Good morning Daryl — been thinking about our predicament. If we don't have cash Tuesday, Clatworthy shuts us down. If we don't have cash on Wednesday, we don't make payroll. Then, it's over. I don't see a way out of this. Based on past experience I don't believe that either Dave Charles or True will come through in time. As I will be out of a job, do you have anything else I can work at that can pay me a salary?

8/31/24 5:50:50 AM EDT

I plan to sell my car and list the beach house.

8/31/24 6:02:03 AM EDT

May I talk to Rick Haller about all of this to get some outside the company perspective?

8/31/24 6:14:39 AM EDT

Maybe you go to Dave Charles and say I need \$6 million on Tuesday and he takes over Cypress now? it's a fire sale type of thing?

8/31/24 6:16:55 AM EDT

I think this last option is our only hope

8/31/24 7:55:51 AM EDT

Daryl are you there?

8/31/24 9:31:59 AM EDT

+17176291559

➔ Replying to you, 2024-08-31 05:49:05: « Good morning Daryl — been thinking about our predicament. If we don't have cash Tuesday, Clatwo... »

Yes, have you covered Randall.

8/31/24 9:32:15 AM EDT

+17176291559

➔ Replying to you, 2024-08-31 05:50:50: « I plan to sell my car and list the beach house. »

I don't think that is necessary

8/31/24 9:33:11 AM EDT

➔ Replying to you, 2024-08-31 05:49:05: « Good morning Daryl — been thinking about our predicament. If we don't have cash Tuesday, Clatwo... »

Daryl, I need to know what you mean specifically as I am currently working on an unwinding plan for myself to take effect immediately

8/31/24 9:33:27 AM EDT

➔ Replying to you, 2024-08-31 05:49:05: « Good morning Daryl — been thinking about our predicament. If we don't have cash Tuesday, Clatwo... »

I just don't see any way out

8/31/24 9:33:52 AM EDT

+17176291559

➔ Replying to you, 2024-08-31 06:02:03: « May I talk to Rick Haller about all of this to get some outside the company perspective? »

Need to talk to you about this. he is in a compromised position and I'm having to limit whatever information I share with him given. He is very close with Jerry, Billy and Zook as well. Talking to him will just make the court case more difficult. We can chat about this over the weekend.

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

8/31/24 9:34:23 AM EDT

+17176291559

➔ Replying to you, 2024-08-31 06:14:39: « Maybe you go to Dave Charles and say I need \$6 million on Tuesday and he takes over Cypress now? it'... »

I talked to him until late last night. He is ready to put two or 3 million down. He was ready to do it yesterday had his legal engaged. There's one hurdle now on CDS that we need to help him with. Let me know when you can talk later today.

8/31/24 9:35:01 AM EDT

I can talk at anytime, Daryl

8/31/24 9:35:18 AM EDT

+17176291559

➔ Replying to you, 2024-08-31 05:49:05: « Good morning Daryl — been thinking about our predicament. If we don't have cash Tuesday, Clatwo... »

Any sale of assets with Charles immediately raise significant cash. I chatted with him at 7 PM last night.

8/31/24 9:35:24 AM EDT

So, call me whenever

8/31/24 9:35:43 AM EDT

Yes, but 2 to 3,000,000 is not enough

8/31/24 9:36:37 AM EDT

We need 3 million just to make customer payments

8/31/24 9:37:41 AM EDT

Then another million to take care of aging vendors.

8/31/24 9:37:53 AM EDT

Plus payroll plus John Clatworthy

8/31/24 9:38:07 AM EDT

+17176291559

That combined with other funding on my side and is interim

850k cash connect

1.3m cypress

Another 500k plus on aged

payroll should be covered by the 60 K a day we're getting between today and Wednesday, which is five days and 300k

8/31/24 9:38:58 AM EDT

Yes, but there's daily investor payments going out. I again think we are needing way more in order to survive plus whatever you have back on your side

8/31/24 9:39:02 AM EDT

+17176291559

The merchant Cypress payment due on 10 September should have 1 million covered by CDS plus the typical hold back of 300 and some K they've done. It should be close to covered by the 10th.

I need to talk to you about what Charles is telling me on how we should be handling it. He seems highly motivated to engage on that piece of business.

8/31/24 9:39:30 AM EDT

So yes, but we still have 1.4 million in arrears plus the first part of August to cover as well, which is probably gonna be 1.7 or more

8/31/24 9:40:05 AM EDT

Plus, I'm fearful that this is all gonna collapse around you and I'm gonna be drugging on legal stuff that I don't want to be part of

8/31/24 9:40:22 AM EDT

+17176291559

Can someone send me the total merchant payments aged through end of August?

Is it just the Cyprus 1.3 million and another 1 million ? I never saw Denis answer the question if there is stuff that dates back to June July or if it is just aged for August



8/31/24 9:42:22 AM EDT

I will get this

8/31/24 9:44:14 AM EDT

Plus, I am owed 125,000 and Dennis at least that much for credit cards. I'm looking to sell my personal cars so I can raise enough capital to pay those off.

8/31/24 9:44:57 AM EDT

Plus, I found out that I'm personally guaranteed some purchases of ATMs for Genmega on a credit application that I never signed but somebody stamped my signature for that's about 20 or 25,000

8/31/24 9:45:43 AM EDT

+17176291559

➔ Replying to you, 2024-08-31 09:40:05: « Plus, I'm fearful that this is all gonna collapse around you and I'm gonna be drugging on legal s... »

Randall, that's why I'm keeping everything off of you. And encouraging you not to talk to people as people such as Rick Haller who will absolutely be supeoned if we don't settle and everything will be under oath. I will absolutely be I'm putting this on my shoulders and away from you. Legal wants me to hire counsel at Prestige and remove the lawsuit, which gives us a couple month reprieve to settle. The lawsuit was illegally filed, and I have the right to terminate it as majority owner of Prestige. I am just trying not to get into that tactic and we presented an offer last night that I'm confident HUM capital would provide us the cash for. The challenge has been these lawsuits. Continue to need to rationalize why they're out there with our recap partners. Legal is pleading with me not to talk to anyone not to share information and as recent as last night told me to tell you the same.

I think true will do this deal Independent of all this.

8/31/24 9:46:28 AM EDT

+17176291559

➔ Replying to you, 2024-08-31 09:44:14: « Plus, I am owed 125,000 and Dennis at least that much for credit cards. I'm looking to sell my perso... »

Need to use the first recap dollars to cover this Randall

8/31/24 9:46:46 AM EDT

+17176291559

➔ Replying to you, 2024-08-31 09:44:57: « Plus, I found out that I'm personally guaranteed some purchases of ATMs for Genmega on a credit appl... »

So this is a 20 or 25K invoice? Am I on it as well?

8/31/24 9:47:11 AM EDT

No, somebody took the signature stamp and stamped my name on it. That was used for checks probably eight years ago.

8/31/24 9:47:22 AM EDT

+17176291559

➔ Replying to you, 2024-08-31 09:44:14: « Plus, I am owed 125,000 and Dennis at least that much for credit cards. I'm looking to sell my perso... »

Did we make the minimum payments? The company needs to handle this for you not selling vehicles!

8/31/24 9:47:46 AM EDT

+17176291559

➔ Replying to you, 2024-08-31 09:47:11: « No, somebody took the signature stamp and stamped my name on it. That was used for checks probably eig... »

What is dollar amount?

8/31/24 9:48:09 AM EDT

\$20k

8/31/24 9:49:11 AM EDT

It's just that little cash has come into Paramount since this has started and I'm at the end of my rope here

8/31/24 9:49:38 AM EDT

If we don't have cash Tuesday Clatworthy shuts us down

8/31/24 10:06:24 AM EDT

The challenge I have, as I just don't see this recapitalization going through with all that's been going on with Jerry from a legal perspective. I think they are spooked and it could be a long time till we see their capital. I think our only option is Dave Charles.

8/31/24 10:25:52 AM EDT

Did we get release from Superior?

8/31/24 10:28:01 AM EDT

Rose emailed all of the contracts yesterday

8/31/24 2:09:56 PM EDT

+17176291559

➔ Replying to you, 2024-08-31 10:06:24: « The challenge I have, as I just don't see this recapitalization going through with all that's been... »

Send email on this. David is highly motivated. He thought he could do it quick until he found something out about LK numbers being owned by PAI. Came up with another strategy late Friday. Let me know when you can send a PAI agreement.

8/31/24 2:10:10 PM EDT

+17176291559

➔ Replying to you, 2024-08-31 10:25:52: « Did we get release from Superior? »

Been back and forth

8/31/24 2:10:43 PM EDT

Just emailed to you.

8/31/24 2:12:05 PM EDT

➔ Replying to you, 2024-08-31 10:25:52: « Did we get release from Superior? »

Did he at least give us an extension?

8/31/24 2:12:24 PM EDT

+17176291559

Yea

8/31/24 2:12:35 PM EDT

Liked "Yea "

8/31/24 2:28:20 PM EDT

Is your deal done with Jerry?

8/31/24 2:31:29 PM EDT

+17176291559

What deal?

8/31/24 2:31:45 PM EDT

Investor payout

8/31/24 2:31:45 PM EDT

+17176291559

From Dave right now

8/31/24 2:31:48 PM EDT

+17176291559

Do you have current past dues to Cypress customers all levels

8/31/24 2:32:03 PM EDT

+17176291559

Can we send them the complete list of 1300 and all the ones that were paid except the last 10

8/31/24 2:32:03 PM EDT

Dennis would have that.

8/31/24 2:32:10 PM EDT

+17176291559

I think he will put 3 million down

8/31/24 2:32:15 PM EDT

Cool.

8/31/24 2:32:25 PM EDT

+17176291559

I'm working on a collateral package for him

8/31/24 2:32:35 PM EDT

Awesome

8/31/24 2:34:33 PM EDT

+17176291559

➔ Replying to you, 2024-08-31 14:31:45: « Investor payout »

We just put an offer into them again last night. They did ask a question or two which is postuvr

8/31/24 2:37:12 PM EDT

Good. Would love to have that behind us

8/31/24 2:37:29 PM EDT

+17176291559

I think it's gonna take a little bit Randall, but it will happen

9/3/24 8:05:34 AM EDT

\$21,303 due for mortgage today. Any cash anywhere ?

9/3/24 8:55:03 AM EDT

I think Dennis is going to quit here soon

9/3/24 8:55:37 AM EDT

+17176291559

He doesn't want to move into the consultant role

9/3/24 8:55:54 AM EDT

I don't know. He's in a bad space. This is touch and go

9/3/24 8:56:22 AM EDT

He can't get past the idea that we are hurting people

9/3/24 8:56:52 AM EDT

Fundamentally feels shitty about how we are treating people investors partners etc.

9/3/24 9:00:38 AM EDT

No answers, no cash etc.

9/3/24 9:01:05 AM EDT

Wish we had something to grab hold of and give hope. Hopelessness

9/3/24 9:01:20 AM EDT

+17176291559

That should be the case with David Charles

9/3/24 9:01:28 AM EDT

He can't survive this coming out negatively.

9/3/24 9:01:47 AM EDT

Texting you as I'm talking with him

9/3/24 9:02:25 AM EDT

+17176291559

➔ Replying to you, 2024-09-03 08:56:52: « Fundamentally feels shitty about how we are treating people investors partners etc. »

I understand, we all do. The investor issue is largely misinformation.

9/3/24 9:02:38 AM EDT

➔ Replying to you, 2024-09-03 08:56:52: « Fundamentally feels shitty about how we are treating people investors partners etc. »

Agree

9/3/24 9:03:36 AM EDT

I told him a lot more people get hurt a lot more if we don't do everything we can do help save it.

9/3/24 9:06:06 AM EDT

+17176291559

Emphasized "I told him a lot more people get hurt a lot more i..."

9/3/24 9:06:19 AM EDT

This is my position

9/3/24 9:06:56 AM EDT

He said he doesn't have emotional strength to deal with this much longer

9/3/24 9:07:05 AM EDT

Feels like a zombie.

9/3/24 9:09:43 AM EDT

Said the \$8M, \$6M and \$1M credit facilities are an example of assurances by you of funding that we need now but still not coming and doesn't believe it will

9/3/24 9:10:07 AM EDT

+17176291559

I'll reach out to him.

9/3/24 9:11:09 AM EDT

Orrstown bank getting called Friday and we are all guarantors

9/3/24 9:11:58 AM EDT

Superior law suit getting us removed

9/3/24 9:12:09 AM EDT

Not done yet

9/3/24 9:12:41 AM EDT

Just too much

9/3/24 9:12:53 AM EDT

When you put it all together

9/3/24 9:14:05 AM EDT

Feels like he is on the verge of a breakdown

9/3/24 9:14:13 AM EDT

+17176291559

➔ Replying to you, 2024-09-03 09:11:09: « Orrstown bank getting called Friday and we are all guarantors »

Send this to me as we got this deferred

9/3/24 9:16:37 AM EDT

I didn't get anything. I think he did on behalf of Paramount

9/3/24 9:16:55 AM EDT

We absolutely need some big wins this week

9/3/24 9:17:14 AM EDT

The feelings of hopelessness are rampant

9/3/24 9:17:41 AM EDT

I'm worried we lose finance team leadership in general which would be devastating

9/3/24 9:18:28 AM EDT

Unfortunately they are in a "Show me" position

9/3/24 9:18:39 AM EDT

So talk won't cut it

9/3/24 9:25:43 AM EDT

Just being direct because I think you need to hear it but trust levels from this team for you are very low

9/3/24 10:26:46 AM EDT

+17176291559

100% understandable. It's been maddening. Getting on a call with David shortly

9/3/24 10:26:54 AM EDT

+17176291559

And then true



9/3/24 10:27:13 AM EDT

+17176291559

Just hoard the cash today. Clatworthy is already moved everything until tomorrow and perhaps later.

9/3/24 10:27:26 AM EDT

+17176291559

We do need to pay Tommy and Joey 10K today. If you can ACH them 10K it would be great.

9/3/24 10:27:34 AM EDT

+17176291559

That was my commitment to them Saturday

9/3/24 10:27:41 AM EDT

+17176291559

What is the minimum needed for payroll?

9/3/24 10:27:43 AM EDT

Liked "We do need to pay Tommy and Joey 10K today. If you..."

9/3/24 10:27:56 AM EDT

I don't know yet let me find out

9/3/24 10:29:54 AM EDT

We need to meet with Erin and Aaron today to talk about Dennis's role change. I think this might help him psychological if he knew he were not responsible for Paramount as an officer and shareholder.

9/3/24 12:55:21 PM EDT

We need to take Dennis off our text communication so let's just communicate here

9/3/24 12:56:41 PM EDT

Any update on David or True?

9/3/24 1:02:59 PM EDT

+17176291559

I just hung up with David. He's called me back at three. Very positive call

9/3/24 1:03:05 PM EDT

+17176291559

Brandon called me twice when I was on that call and I will call him back

9/3/24 1:03:23 PM EDT

Liked "Brandon called me twice when I was on that call an..."

9/3/24 1:03:27 PM EDT

Liked "I just hung up with David. He's called me back at..."

9/3/24 1:04:33 PM EDT

+17176291559

Yes, Erin makes these things difficult. I think we can put something in writing that he relinquishes his equity. Maybe it's a separate document from him

9/3/24 1:05:09 PM EDT

Liked "Yes, Erin makes these things difficult. I think we..."

9/3/24 2:28:33 PM EDT

The commission calc that is on the table is for \$58K.

If the only inflows and outflows through close of business Thursday are:

Inflows:

- Daily Settlements
- Square inflows that were rejected

Outflows:

- Daily Square payments of \$30K
- Payroll of \$276K
- Sales Commissions of \$58K
- Dental Insurance of \$7K
- An estimated concur payment of \$15K

That will leave us with \$188K.

If we have to wire back the Square deducts that we just rejected for \$60K, we will have a balance of \$128K.

9/3/24 2:29:12 PM EDT

Cash flow if we send commissions in addition to payroll. Need to decide by close of business today

9/3/24 2:29:34 PM EDT

+17176291559

And deferring commissions or pay 50% now and 50% next payroll will not work?

9/3/24 2:32:03 PM EDT

We already deferred commissions for a month I'd be challenged if this word gets out that we aren't paying compensation earned. Might be able to defer some of this for some people for various reasons.

9/3/24 2:32:22 PM EDT

+17176291559

How to further you. Pay it if you need to.

9/3/24 2:32:40 PM EDT

Liked "How to further you. Pay it if you need to."

9/3/24 2:33:32 PM EDT

+17176291559

I'll defer to you \*

9/3/24 4:54:58 PM EDT

Any update on Dave Charles or True ?

9/3/24 5:01:33 PM EDT

+17176291559

Talking again at 4 PM his time which is right now

9/3/24 5:03:12 PM EDT

Cool. Think we will close this today?

9/3/24 5:05:22 PM EDT

+17176291559

He seems like he wants to do the deal, but he's so tough fully pin down

9/3/24 5:05:38 PM EDT

+17176291559

Is Brent Ballman the one Cypress affiliate that has been an issue?

9/3/24 5:05:42 PM EDT

Yep

9/3/24 5:05:54 PM EDT

+17176291559

I guess he's talking to Zook

9/3/24 5:06:09 PM EDT

Interesting wonder how he found out about him?

9/3/24 5:06:17 PM EDT

I don't know I haven't heard his name before

9/3/24 5:06:19 PM EDT

+17176291559

They probably found him

9/3/24 5:06:31 PM EDT

Probably Maya

9/3/24 5:06:37 PM EDT

+17176291559

Yep

9/3/24 5:07:19 PM EDT

+17176291559

What is the amount we owe him?

9/3/24 5:07:55 PM EDT

I don't know who he is but will find out.

9/3/24 5:08:26 PM EDT

+17176291559

Bauman

9/3/24 5:08:53 PM EDT

Researching

9/3/24 5:09:41 PM EDT

Anything on True?

9/3/24 5:09:46 PM EDT

Are they slow rolling?

9/3/24 5:10:40 PM EDT

+17176291559

No. I had to send them information on the ATM lawsuit this afternoon. I think we will be good.

9/3/24 5:11:03 PM EDT

Good. Close this week?

9/3/24 5:26:22 PM EDT (Edited 9/3/24 5:26:39 PM EDT)

Texted with Derek who has been communicating with Cypress customers and that name doesn't ring a bell

Edited

9/3/24 5:26:53 PM EDT

Any idea of company name?

9/3/24 5:27:48 PM EDT

Never mind. We found it

9/3/24 5:35:54 PM EDT

+17176291559

How much do we owe?

9/3/24 5:36:10 PM EDT

Researching

9/3/24 5:41:21 PM EDT

the are part of a larger customer affiliate that hasn't been paid. we are not sure which one but will find out

9/3/24 5:43:00 PM EDT

\$30,000

9/3/24 5:43:12 PM EDT

is what is owed to Angus Arcades who has this as one of their customers

9/3/24 5:43:25 PM EDT

+17176291559

Brent bauman - ACV holdings

9/3/24 5:43:48 PM EDT

Ok

9/3/24 5:46:25 PM EDT

\$30k

9/3/24 5:47:56 PM EDT

+17176291559

Directly to him or to someone else?

9/3/24 5:48:11 PM EDT

Someone else

9/3/24 5:48:17 PM EDT

+17176291559

Still waiting on Dave Charles

9/3/24 5:48:25 PM EDT

Liked "Still waiting on Dave Charles "

9/3/24 5:49:14 PM EDT

They are an affiliate of an affiliate

9/3/24 5:59:54 PM EDT

Many customer issues and threats to leave. Just making you aware.

9/3/24 6:22:04 PM EDT

If Dave bails on us can we get True to close this week?

9/3/24 7:11:54 PM EDT

Or can we get David Dove to pay the Cypress customers just enough to get them off our back and a little bit more and take over that business?

9/3/24 7:12:13 PM EDT

If Dave Charles doesn't have any competition, I think he's negotiating the best deal he can

9/3/24 7:12:53 PM EDT

David Dove may feel like they're liable anyway and make this go away and get a term sheet to purchase

9/3/24 7:13:56 PM EDT (Edited 9/3/24 7:14:15 PM EDT)

And since he already has the business, he knows what the margins are. He wouldn't wanna lose this anyway let him know that Dave Charles is gonna write a check. It might've move him off the spot quickly

Edited

9/3/24 7:14:50 PM EDT (Edited 9/3/24 7:14:58 PM EDT)

We'd be further ahead if he could write a check for 3 million get it to us this week

Edited

9/3/24 7:21:34 PM EDT

So pay off Cypress and get us another \$2M

9/3/24 7:26:50 PM EDT

+17176291559

Do you want to talk real quick. I just hung up with Dave .

9/3/24 7:27:03 PM EDT

Yes

9/3/24 7:28:11 PM EDT

Should I call you?

9/3/24 7:52:48 PM EDT

How much is the credit facility for true?

9/3/24 7:59:16 PM EDT

Please send me executed LOI from David Charles when you actually get it tonight so I can give exec team a heads up that we have something. I will not send it to them but let them know that we have it in place.

9/3/24 8:02:34 PM EDT

Also will want to pay beach house mortgage asap this week.

9/4/24 8:52:19 AM EDT

Good morning Daryl just making sure you're keeping an eye on all the emails from legal counsel related to the Jerry lawsuit

9/4/24 10:24:22 AM EDT

+17176291559

Can we quickly push 25K to DHR LL to cover Midwest loan and the Carmen Bella sale. I presume the second is cleaning?

9/4/24 10:24:54 AM EDT

Yes.



9/4/24 10:25:17 AM EDT

Get from Paramount?

9/4/24 10:33:12 AM EDT

+17176291559

Should be 20 K. There's already 5K in the account. 20 K will clear it.

9/4/24 10:33:18 AM EDT

+17176291559

Yes, I believe they sent a DHL

9/4/24 10:36:13 AM EDT

By the way, I canceled the yardwork here at the beach house. They are sending our deposit check back. I did not tell Char as I assumed you probably would want to.

9/4/24 10:36:29 AM EDT

I think it's around 4K coming back

9/4/24 10:36:45 AM EDT

We also need to pay Evan about 4K for his work on renting the beach house this year

9/4/24 10:37:25 AM EDT

+17176291559

Do we use that 4K to pay him or do you want to do more wire?

9/4/24 10:37:36 AM EDT

Will use the 4K coming back to pay him. I told him it could be a couple weeks.

9/4/24 10:37:42 AM EDT

He's OK with that

9/4/24 11:28:54 AM EDT

Nestor is hitting me for a conversation, how did you make out with him last week?

9/4/24 11:29:13 AM EDT

+17176291559

It went well

9/4/24 11:29:27 AM EDT

+17176291559

He's fine waiting until the end of this week or early next.

9/4/24 11:29:40 AM EDT

Ok. Thanks.

9/4/24 11:30:18 AM EDT

Did you get through the collateral package for David Charles?

9/4/24 11:31:24 AM EDT

+17176291559

He signed LOI. Talk to him twice this morning. Waiting to get home with his legal. I gave him 1231 and 130.

9/4/24 11:31:59 AM EDT

+17176291559

Barto is demanding to meet quickly. Do you know how much Warehouse space we will need going forward?

9/4/24 11:32:51 AM EDT

Dennis has a better feel for all this as he's been researching it maybe ask him I think we're saying we can go down to 5000 ft.<sup>2</sup> eventually

9/4/24 11:39:04 AM EDT

Tony Braglio who is one of our acquisition partners is going to reach out to you regarding past due payments. I told him we are very close to closing on credit facility to get everyone current but he want to understand more.

9/4/24 12:11:54 PM EDT

Just chatted with Dennis we think we need 10,000 ft.<sup>2</sup> after we've removed all of the investor ATMs. We are pausing on the removal project until we hear from you.

9/4/24 2:42:16 PM EDT

Any update on Dave Charles?

9/4/24 4:03:12 PM EDT

Questioned "Any update on Dave Charles?"

9/4/24 4:18:17 PM EDT

We were just notified that a Cyprus partner took his business elsewhere trying to find out how much GP we lost

9/4/24 4:18:27 PM EDT

I suspect we have more on the way, unfortunately

9/4/24 4:22:42 PM EDT

We know others of shut their machines off, so likely going as well

9/4/24 5:32:07 PM EDT

Sorry to keep pestering you but how is it going with true?

9/4/24 5:52:25 PM EDT

Dispensaries are in jeopardy

9/4/24 5:52:30 PM EDT

From Doug Michola

Hi Steve

I am out of the country until Friday

But missed several calls.

Probably the most important is Danny with Mid Fla armor.

I would imagine they are going to suspend service.

Im not sure PMG is still in service, so I don't know what to tell him.

The dispensaries will start reaching out to him first and I don't know what to tell him or anyone else for that matter.

I know you are suffering from this to so I hate to reach out to you, but I have no one else to ask.

That will deal with me straight

Can you shed any light on this for me?

9/4/24 9:29:40 PM EDT

Any update on Dave Charles?

9/5/24 6:56:33 AM EDT

Daryl please respond. I can't do this job without your communication

9/5/24 7:16:02 AM EDT

Maybe you should sit down with Jerry and Zook and whomever - explain the situation, ask for an emergency infusion of cash and work together on an orderly liquidation with them?

9/5/24 7:17:24 AM EDT

I just can't take another sleepless night

9/5/24 7:33:01 AM EDT

Anything is better than this hell we are living.

9/5/24 7:52:22 AM EDT

Daryl please respond?

9/5/24 8:09:06 AM EDT

Also, DLA Piper is demanding \$270k payment today.

9/5/24 8:44:43 AM EDT

plus just received this as well — this won't work for either Dennis or me.

9/5/24 8:44:44 AM EDT

Daryl and Randall,

As you know, the Court set an expedited discovery schedule and Preliminary Injunction hearing. The Preliminary Injunction hearing is Oct. 15, so you both need to be available to testify on that date. Also, we need the CFO too, so please make sure he is available on that date too.

Right now, we have to quickly answer interrogatories and respond to document requests, all within the next week. So, we will need you both to work with my team to get that accomplished. Please let me know your availability for a call on this this afternoon at 3-6 ET.

Lastly, I need the information I requested last week as soon as possible so we can plan the strategy and defense here. I will resend the email to you.

Thanks.

9/5/24 8:47:03 AM EDT

neither of us wants our names in the paper

9/5/24 9:00:57 AM EDT

+17176291559

Been on call since early and just seeing this

9/5/24 9:01:58 AM EDT

+17176291559

➔ Replying to you, 2024-09-04 21:29:40: « Any update on Dave Charles? »

Spoke to his legal again last night she has the documents. She said she's reviewing this morning and hopefully we can get a wrapped to this. I push David hard again last evening on the need to get this \$3 million wire. He's acting like he's aligned and no problem so the only concern is that it is Dave Charles.

9/5/24 9:02:15 AM EDT

➔ Replying to you, 2024-09-04 21:29:40: « Any update on Dave Charles? »

Liked "Spoke to his legal again last night she has the do..."

9/5/24 9:02:25 AM EDT

+17176291559

➔ Replying to you, 2024-09-05 07:16:02: « Maybe you should sit down with Jerry and Zook and whomever - explain the situation, ask for an emerge... »

I don't think that approach will work, but I have been talking with them off-line as of yesterday morning and afternoon

9/5/24 9:02:36 AM EDT

➔ Replying to you, 2024-09-05 07:16:02: « Maybe you should sit down with Jerry and Zook and whomever - explain the situation, ask for an emerge... »

Liked "I don't think that approach will work, but I have ..."

9/5/24 9:02:55 AM EDT

Anything on True?

Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

9/5/24 9:03:28 AM EDT

+17176291559

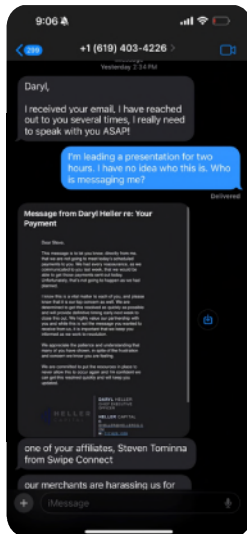
I spoke to these two affiliates last night and had good conversations. Both of them were very reasonable after our conversation. They're going nowhere. I told them we're trying to get Augustus cleaned up on Monday and that most not all of the money is set aside for, the September payment

9/5/24 9:03:46 AM EDT

Cool.

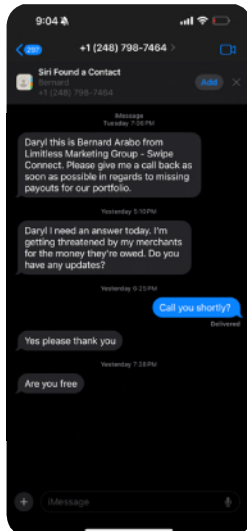
9/5/24 9:09:33 AM EDT

+17176291559



9/5/24 9:09:40 AM EDT

+17176291559



9/5/24 9:10:38 AM EDT

Thanks

9/5/24 9:10:57 AM EDT

+17176291559

➔ Replying to you, 2024-09-05 07:17:24: « I just can't take another sleepless night »

im sorry. trying to negotiate a settlement the last two days

9/5/24 9:11:05 AM EDT

Thanks.

9/5/24 9:11:59 AM EDT

+17176291559

➔ Replying to you, 2024-09-05 08:44:44: « Daryl and Randall,

As you know, the Court set an expedited discovery schedule and Preliminary Injun... »

we can remove both of you. Obviously legal just trying to get as much representation as we can, but I think keeping you and Denis out of it could be of value and beyond that I want to keep you away from it.

9/5/24 9:12:15 AM EDT

Thanks

9/5/24 9:14:20 AM EDT

+17176291559

➔ Replying to you, 2024-09-05 09:02:55: « Anything on True? »

I talked to Brandon yesterday. I provided all the information on the article that had read from the paper so I don't think there's gonna be a problem. I'll hit him again this morning.

9/5/24 9:15:02 AM EDT

➔ Replying to you, 2024-09-05 09:02:55: « Anything on True? »

Thanks. We need this asap because even the \$3M isn't going to be enough

9/5/24 9:40:00 AM EDT

Daryl rebel oil which is one of the affiliates you spoke with last night has 200 of our machines unplugged and about \$1.8 million of Cash Connect cash is in there. Cash Connect may soon demand that we got both the cash out of there because the ATMs are not transacting.

9/5/24 9:40:38 AM EDT

+17176291559

Which guy is that is they were both super nice?

9/5/24 9:41:07 AM EDT

Bernard's Arabo

9/5/24 9:43:02 AM EDT

Also, Mike Rabah needs to speak with you. He's tired of our responses and getting very frustrated.

9/5/24 9:43:29 AM EDT

Please call him at your earliest convenience

9/5/24 9:44:58 AM EDT

+17176291559

Liked "Please call him at your earliest convenience"

9/5/24 9:45:14 AM EDT

Sorry to hit you so much but also Dennis is needing a call from you as well

9/5/24 10:07:02 AM EDT

**From Steve regarding rebel oil just so you know**

So all understand, with all the Rebel sites turned off and armored are refused service, we will have a major problem on our hands soon with Cash Connect

9/5/24 10:08:07 AM EDT

Just so you know how this works if armor is refused then Cash Connect will treat this as a theft and deducted cash from us until they get it back. They will work with us so as long as we're able to show progress



9/5/24 10:41:09 AM EDT

➔ Replying to you, 2024-09-05 09:45:14: « Sorry to hit you so much but also Dennis is needing a call from you as well »

Dennis is tripping right now. Can you talk to him today please?

Text message

9/5/24 10:47:03 AM EDT

He wants out now.

9/5/24 11:07:27 AM EDT

Here are your top priorities as I see them from my perspective. Are you focused on these things in all of your conversations?

9/5/24 11:07:34 AM EDT

- PMG short term capital
- Investor payment agreement
- Heller Capital Recapitalization
- Heller Capital Restructure

iMessage

9/5/24 11:08:10 AM EDT

+17176291559

I'll call him. He doesn't wanna play a consultant role.

9/5/24 11:08:31 AM EDT

+17176291559

Nonstop randall

9/5/24 11:08:48 AM EDT

The way he talk today is that he wants to form his own consulting business provide accounting finance services for us, Heller Capital and even Bitstop. Apparently had some conversation with Andrew about.

9/5/24 11:09:19 AM EDT

He's even speaking with legal on his side now at this point, but he wants out right now

9/5/24 11:09:45 AM EDT

Thanks, just wanted to make sure.

9/5/24 11:10:55 AM EDT

+17176291559

Liked "The way he talk today is that he wants to form his..."

9/5/24 11:11:47 AM EDT

Any word out of Dave Charles?

9/5/24 11:38:02 AM EDT

Tommy and Joe are hitting me pretty hard

9/5/24 11:52:50 AM EDT

From Torosian email

9/5/24 11:52:53 AM EDT

FYI, the Plaintiffs just filed the attached motion papers regarding the confidentiality sealing of the transcript from the TRO hearing. The Court set a telephonic hearing on this for this afternoon. I'll report back how it goes. Bottom line, we're fine unsealing the portions of the transcript during which the courtroom wasn't cleared but think the portions during which it was cleared should remain attorneys' eyes only.

9/5/24 12:02:09 PM EDT

➔ Replying to you, 2024-09-05 11:11:47: « Any word out of Dave Charles? »

Bringing this to the top

9/5/24 12:15:06 PM EDT

+17176291559

Yes. Great Convo. Last piece is legal approval and she just sent back

9/5/24 12:15:19 PM EDT

Loved "Yes. Great Convo. Last piece is legal approval an..."

9/5/24 12:15:27 PM EDT

Funding today?

9/5/24 12:20:25 PM EDT

+17176291559

Send you email

9/5/24 12:28:37 PM EDT

+17176291559

Sent

9/5/24 12:28:44 PM EDT

Got it. Thanks.

9/5/24 12:28:57 PM EDT

Makes me feel better seeing this.

9/5/24 12:30:38 PM EDT

Are you majority owner in this entity as well?

9/5/24 12:32:29 PM EDT

+17176291559

100% owner

9/5/24 12:32:44 PM EDT

Wow!

9/5/24 12:33:08 PM EDT

+17176291559

Of heller investment holdings

9/5/24 12:33:27 PM EDT

Ok.

9/5/24 12:33:37 PM EDT

+17176291559

Heller own 30% of Gcc

9/5/24 12:33:43 PM EDT

Ok

9/5/24 12:36:52 PM EDT

After you take out investors in PMG what is your estimated net worth?

9/5/24 12:37:12 PM EDT

Sorry to ask but feeling like this would help me

9/5/24 12:44:51 PM EDT

+17176291559

I can send you my PFS. It really comes down to what investors get taken out for which is a fraction of what they're asking for.

9/5/24 1:00:26 PM EDT

Liked "I can send you my PFS. It really comes down to wha..."

9/5/24 1:00:54 PM EDT

DLA piper hitting email again about payment today

9/5/24 3:47:18 PM EDT

Greg Fabiani one of our acquisition partners is frustrated about customer payments. He plans to reach out to you

9/5/24 5:13:49 PM EDT

Anything on Dave Charles?

9/5/24 5:19:16 PM EDT

+17176291559

Yes, constant communication. He's forcing me into a personal guarantee. He's implying he's going to do the deal.

9/5/24 5:19:30 PM EDT

Liked "Yes, constant communication. He's forcing me into ..."

9/5/24 5:19:52 PM EDT

+17176291559

My call an hour ago with him was very positive

9/5/24 5:20:02 PM EDT

Good. Glad to hear it.

9/5/24 5:20:31 PM EDT

+17176291559

Brandon is calling me at 7 o'clock as well.

9/5/24 5:20:47 PM EDT

Cool. How do you feel about that ?

9/5/24 5:21:31 PM EDT

+17176291559

Good

9/5/24 5:23:02 PM EDT

Gut feel for when funding comes in from this?

9/5/24 5:45:03 PM EDT

See emails from Torosian. Asking for payment

9/6/24 8:05:57 AM EDT

➔ 2024-09-05 17:20:31: « Brandon is calling me at 7 o'clock as well. »

How did this go? How soon for funding?

9/6/24 8:07:30 AM EDT

Good morning by the way 😊

9/6/24 8:31:13 AM EDT

+17176291559

Good morning, randall

9/6/24 11:41:20 AM EDT

Please see the email from Torosian

9/6/24 11:49:37 AM EDT

+17176291559

Can you please send me back? The location address is for Christian Yatooma that includes the TID numbers on the spreadsheet?

9/6/24 11:50:12 AM EDT

I don't understand what you are requesting?

9/6/24 11:56:54 AM EDT



Illinois Terminal List - 8-23-24.pdf

9/6/24 11:56:54 AM EDT

+17176291559

Are the numbers on the spreadsheet you sent me for superior ATMs the actual TID number?

9/6/24 12:03:41 PM EDT

yes. that's what I understand

9/6/24 2:29:32 PM EDT

Daryl the other text is Sam and Nick from Mozika.

9/6/24 3:03:54 PM EDT

Please see email I just sent you regarding cypress payment

9/6/24 3:07:01 PM EDT

I told them we want to pay July first. But at least we have the amount for August.

9/6/24 3:11:01 PM EDT

+17176291559

Anything on lost cypress accounts?

9/6/24 3:11:49 PM EDT

Yes. Steve just emailed a report. Looks like a lot of drop off

9/6/24 3:20:01 PM EDT

If we don't include today and yesterday last transaction, which I don't think we should we have about 1500 location loss

9/6/24 3:21:59 PM EDT

Steve said he confirmed with Laura that FIS customers are paid directly so we don't owe anything there

9/6/24 3:45:49 PM EDT

taking a different approach to the data as I'm not sure it's right. Asking Scheck to pull this up

9/6/24 3:46:10 PM EDT

we don't work in CDS and not feeling comfortable with this approach.

9/6/24 3:46:20 PM EDT

i expressed the urgency

9/6/24 3:51:06 PM EDT

scheck thinks we lost 8.

9/6/24 4:05:19 PM EDT

what are we going to tell Cash Connect?

9/6/24 4:26:35 PM EDT

Let me know when he initiates a wire.

9/6/24 5:21:55 PM EDT

Any hope of True next week?

9/6/24 5:22:20 PM EDT

+17176291559

Yes

9/6/24 5:22:28 PM EDT

+17176291559

Dave said he initiated wire

9/6/24 5:22:44 PM EDT

Nice! 1.7M?

9/6/24 5:23:09 PM EDT

+17176291559

Yes

9/6/24 5:23:38 PM EDT

Cool. I will let team know. We may want to pay these guys direct to save some time.

9/6/24 5:26:52 PM EDT

What are chances we get funding from True next week ?

9/6/24 5:44:21 PM EDT

**From Gernes**

For Cypress, to finalize July +5% and August, we need to provide CDS with \$2,051,083.34. The \$1.7 wire leaves us \$350k short.

9/6/24 5:44:40 PM EDT

We know this but wanted to give you the number.

9/6/24 7:15:06 PM EDT

So I assume we are going to wire July ACH but not August on Monday. Is that correct?

9/6/24 7:15:33 PM EDT

+17176291559

No, I think we should be strategic.

The people that have left I absolutely don't think we should pay. I think we should use it to get them back. They didn't put us on notice.

9/6/24 7:16:10 PM EDT

+17176291559

Let's get strategy and try to get it down to three or four players and 6-8 of them and perhaps include September so we have all but a couple paid in full through September

9/6/24 7:17:28 PM EDT

Ok. I will ask Steve and Derek to evaluate and recommend a strategy

9/7/24 7:54:03 AM EDT

Good morning Daryl. What is the status update on True. Can we get these funds Monday or Tuesday?

9/7/24 8:37:44 AM EDT

Will you please respond to this?



9/7/24 8:39:40 AM EDT

+17176291559

I need access to check the wire, but Dave said it left his account so I'm 99% certain yes

9/7/24 8:39:45 AM EDT

+17176291559

Talking to Brandon at 2 PM

9/7/24 8:40:28 AM EDT

Sorry 99% certain that true will fund on Monday or Tuesday?

9/7/24 8:43:26 AM EDT

Just trying to get a bead on true please.

9/7/24 8:59:21 AM EDT

Questioned "Sorry 99% certain that true will fund on Monday or..."

9/7/24 9:00:38 AM EDT

+17176291559

As am I. They were fully committed with the syndicate and waiting for the partners to fund. I think they still will do it. I just thought they would've done it with him a few days a week and it's been a week. The lawsuit they pulled down did not help but I'm still very very confident. I will know more after my 2 PM.

9/7/24 9:01:09 AM EDT

Loved "As am I. They were fully committed with the syndic..."

9/7/24 9:03:01 AM EDT

Any word out of Clatworthy?

9/7/24 9:03:35 AM EDT

+17176291559

He was fine sending him what we had which was 50 K on Friday. I told him.

9/7/24 9:03:41 AM EDT

Liked "He was fine sending him what we had which was 50 K..."

9/7/24 9:05:06 AM EDT

Regarding the lawsuit - do you think you will settle before this hearing occurs?

9/7/24 9:07:57 AM EDT

+17176291559

Yes

9/7/24 9:08:10 AM EDT

Liked "Yes "

9/7/24 2:24:06 PM EDT

➔ 2024-09-07 09:00:38: « As am I. They were fully committed with the syndicate and waiting for the partners to fund. I think they still will do ... »

Please let me know what you find out here after you have talked.  
Thanks

9/7/24 2:46:17 PM EDT (Edited 9/7/24 2:53:59 PM EDT)

If they can't fund the full 8 can they fund half?

Edited

9/7/24 4:20:47 PM EDT

Any update?

9/7/24 4:26:39 PM EDT

+17176291559

Talking again in the morning, Randall. doing everything humanly possible.

9/7/24 4:28:55 PM EDT

Understood. Thank you. Just hoping for a win

9/9/24 6:59:55 AM EDT

Good morning Daryl. What is the messaging we should be using around timing of payments when people want to know then they will be paid?

9/9/24 9:00:34 AM EDT

Daryl, please see mail from Bernard Arabo

9/9/24 9:08:31 AM EDT

+17176291559

On call. Will check. What is Bernard payment owed for Aug and sept?

9/9/24 9:11:27 AM EDT

researching...

9/9/24 9:22:05 AM EDT

Limitless Payments (Swipe Connect)

July: \$153,868.30 (before 5% bump)

August: \$162,378.66

9/9/24 9:23:07 AM EDT

Total of \$323,939.78 including the 5%

9/9/24 9:25:07 AM EDT

+17176291559

Let's have CDS pay the 162k out of that they are holding. And us pay the 153k from the 1.7m to Buck I have

9/9/24 9:27:47 AM EDT

Liked "Let's have CDS pay the 162k out of that they are h..."

9/9/24 9:27:53 AM EDT

+17176291559

Send the 20k to Burroughs. Just need to get money out of PMG account.

9/9/24 9:28:07 AM EDT

Liked "Send the 20k to Burroughs. Just need to get money..."

9/9/24 11:05:51 AM EDT

For the August Cypress payment, we are unable to calculate the amount that CDS withheld along with the amount we need to fund by terminal. We can only see the entire month. Laura Russell who is a subcontractor for us provided the reason why. Here it is:

9/9/24 11:05:52 AM EDT

The payee amounts include surcharge, interchange, flat-fee debits and credits and may cover more than one TID. The amount CDS held 08/16-08/31 was based on a TID and that amount could cover more than one payee. With all those variables it is not possible to drill into each payee to separate surcharge before and after the change in surcharge payments.

Laura Russell  
ATM Accountability

9/9/24 11:07:28 AM EDT

so we know totals for each customer for the entire month but not granular enough to determine the amount withheld vs what is was not withheld

9/9/24 11:09:08 AM EDT

+17176291559

Do we know the exact paint being held by CDS? We think 1.1m?

We need to give them direction on who to pay. Can you send me the spreadsheet that shows all 1300 people we are paying and how much each one so we can strategize? Start with the highest to lowest. This ties to the request I put out yesterday yesterday.

9/9/24 11:12:36 AM EDT

just emailed July and August to you. (you already have July). August is not in order but you can quickly eyeball

9/9/24 11:12:55 AM EDT

I will get in highest to lowest order and resend.

9/9/24 11:13:52 AM EDT

All, just got off the phone with Greg Randall.

ATM Wireless Store has suspended 167 modems (so all terminals are down) last week

We owe them \$3,168.

9/9/24 11:14:06 AM EDT

can se send this \$3,168 please?

9/9/24 11:18:21 AM EDT

+17176291559

➔ Replying to you, 2024-09-09 11:13:52: « All, just got off the phone with Greg Randall.

ATM Wireless Store has suspended 167 modems (so all ... »

Pay it

9/9/24 11:18:35 AM EDT

+17176291559

Yes I can send more

9/9/24 11:25:49 AM EDT

Grand Total  
1,830,515.88

Funds at CDS  
1,218,189.49

Remaining to be paid  
612,326.39

9/9/24 11:25:58 AM EDT

this is the August totals for Cypress

9/9/24 11:30:16 AM EDT

+17176291559

Can we give direction on where they need to send the 1.218m? We need to direct that.

9/9/24 11:33:25 AM EDT

I'm not sure. They didn't cooperate previously to this request.

9/9/24 11:40:50 AM EDT

I think their argument is that these dollars are allocated to various customers. We cannot take dollars from one customer and give it to another.

9/9/24 11:43:25 AM EDT

+17176291559

I thought they took the 326K and paid who we requested?

9/9/24 11:44:22 AM EDT

They did but that was "our" cash. Not saying we shouldn't try, but I believe this is why they ignored us in the past.

9/9/24 11:47:03 AM EDT

+17176291559

A part of this 1.2 million would be our cash as well. Let's put a list to them after you and I review of what they should pay ACH tonight.

9/9/24 11:48:05 AM EDT

ok.

9/9/24 12:19:02 PM EDT

will you please review/approve Gierasch text regarding Dennis?

9/9/24 2:38:35 PM EDT

Meeting with exec team today at 3:30. Any information I can give them about True?

9/9/24 2:54:34 PM EDT

Daryl please see emails. three loaders just dropped us and our reputation is not allowing us to find replacements.

9/9/24 3:12:09 PM EDT

Questioned "Meeting with exec team today at 3:30. Any informat..."

9/9/24 5:27:38 PM EDT

Daryl, Dennis is really hitting me on this consulting thing? Is there a reason you are not approving Steve Gierasch to move forward with him?

9/9/24 7:02:52 PM EDT

Assume you saw attorney email about payment. Just want to be sure

9/9/24 7:06:39 PM EDT

+17176291559

I asked to talk to Matt off-line

9/9/24 7:09:02 PM EDT

Liked "I asked to talk to Matt off-line"

9/10/24 8:52:51 AM EDT

Daryl, following up on the legal request for documents that I received last night. We are NOT working on anything for this. Just wanted to be clear. Should we be pulling these documents together?

9/10/24 9:04:38 AM EDT

+17176291559

It's tax returns and financials, etc. that I have quite a bit of it. Most of this I'm going to object to.

9/10/24 9:07:39 AM EDT

- A schedule of TR31 upgrades for plaintiffs' ATMs.
- Documents sufficient to show Paramount is cashflow-positive.
- Documents sufficient to show that payments are being made on a daily basis to Square Funding.
- Any notices of default received from vendors, clients, or lenders from 1/1/24 to present.
- Documents sufficient to show any obligations that are past due.

9/10/24 9:16:06 AM EDT

ok. just wanted to be sure. Thanks

9/10/24 3:41:58 PM EDT

you ok with these talking points related to Dennis? I will NOT send an email. Just talk to exec and senior leadership team members in our next meetings

9/10/24 3:42:01 PM EDT

**Dennis Role Change Talking Points**  
9-10-24

1. Dennis has decided to change his role at Paramount and Heller Capital Group Companies to pursue his "Dream" to own and operate his own company.
2. His company is named Fraxtion and offers strategic/advisory consulting services to Paramount, Heller Capital, Margo, and Bitstop.
3. How does this impact Paramount?
  - a. Dennis will give half of his time to Paramount and the other half of his time to the other companies (like he did when he was helping Margo previously).
  - b. Dennis will continue to support Brandon and his team (Randall will be supervisor in HR Software/org chart)
  - c. John Scheck will now report to Brandon
  - d. Dennis will still participate on the executive team at Paramount and attend company functions and meetings.
4. This will take effect on Friday September 13.

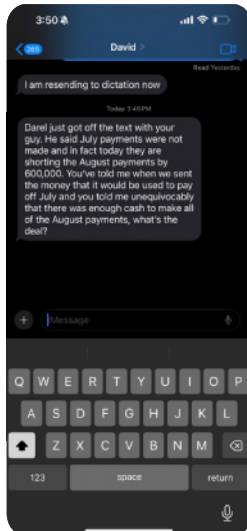
9/10/24 3:51:29 PM EDT

+17176291559

Who is talking to David?

9/10/24 3:51:36 PM EDT

+17176291559





Messages - +17176291559

Certification in Support Page 301 of 810

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

9/10/24 3:51:59 PM EDT

check with Dennis oversight,.

9/10/24 3:52:53 PM EDT

he answered the questions on the due diligence list that was sent to him

9/10/24 3:54:30 PM EDT

+17176291559

Hmmm - I wish I could've finessed that better and given him reason. Can you send me the responses?

9/10/24 3:54:44 PM EDT

yes. they were emailed to you earlier.

9/10/24 3:54:50 PM EDT

but I will send again

9/10/24 3:55:15 PM EDT

in your inbox now

9/10/24 4:20:01 PM EDT

Daryl and Randall, we need to have a call with both of you and the Paramount CFO tomorrow to go through the outstanding discovery and what you want to seek from the Plaintiffs. I understand that you may be gathering information and documents, but we have to do this in a coordinated and appropriate way, so we need to go through this in detail. Unfortunately, we cannot wait any longer on this, so please set aside an hour or two to work with my team to figure out exactly what information we need and which documents to pull and how. We have to get our requests out to Plaintiffs tomorrow and have to fully respond to the outstanding 2nd sets of discovery by Monday, but it will take substantial time to go through this first and make sure you're pulling the right information and documents in the right way.

Randall, you will have to be directly involved in this process for many reasons, which we can discuss further on the call if you would like.

Nate and team can set up the call. Thanks,

Jeffrey S. Torosian  
Partner

9/10/24 4:20:41 PM EDT

I don't feel comfortable with this process.

9/10/24 4:55:58 PM EDT

And will not be part of it.

9/10/24 4:56:35 PM EDT

+17176291559

Randall, I'm trying to get this lawsuit dismissed. We need to talk. The new legal property is going to dismiss it on Friday.

9/10/24 4:57:55 PM EDT

Happy to talk any time day or night. Thanks.

9/10/24 6:04:05 PM EDT

Is Dave Charles still moving forward with us?

9/10/24 6:44:37 PM EDT

+17176291559

Don't respond to jeff yet

9/10/24 6:44:58 PM EDT

I already did on the email. Sorry

9/10/24 6:45:33 PM EDT

No I didn't respond to that.

9/10/24 6:45:47 PM EDT

I thought it was the earlier email.

9/10/24 6:48:51 PM EDT

I will resign before I go on the stand.

9/10/24 7:08:27 PM EDT

I can't go on the stand and testify that we are solvent. I will harm the defense and don't want to be put in that position.

9/10/24 7:16:23 PM EDT

Plus I don't want to be on the stand. I already have more attention than I want with friends and family on this issue.

9/10/24 11:33:23 PM EDT

+17176291559

Randall would never expect you to lie. We are terminating the lawsuit tomorrow regardless so should not matter. Talk in morning.

9/11/24 6:13:25 AM EDT

Happy to talk whenever. Does this action stop Orrstown and free up funding from True and others ? If so how soon will it arrive?

9/11/24 6:38:23 AM EDT

Also - what really bothers me is that everyone else will get paid before I do and the company value is now tanked. So I will have nothing to show for the last 12 years of work. I helped a lot of people make a lot of money and I have will nothing because I'm last in line.

9/11/24 6:42:54 AM EDT

Plus I'm on the hook for \$275k personally that I will need to pay if Paramount doesn't survive which looks like a foregone conclusion at this point. I spent the evening working through my personal finances to figure out how I'm going to pay this. It's not right

9/11/24 6:54:18 AM EDT

My reputation in this county has been trashed by association. I'd be afraid to use Paramount on any resume as it would require explanation and work to overcome. It would be one thing if I could have enough cash to retire and not need another job but based on the above I will need to continue working regardless.

9/11/24 6:56:26 AM EDT

It's just not right.

9/11/24 7:13:21 AM EDT

I feel like I should be included in the investor payouts. As they get paid I should get paid regardless of the value of Paramount.

9/11/24 7:20:25 AM EDT

Actually I would like priority over them.

9/11/24 7:21:06 AM EDT

+17176291559

➔ Replying to you, 2024-09-11 06:13:25: « Happy to talk whenever. Does this action stop Orrstown and free up funding from True and others ? If ... »

I've e even talking daily and think I have them beyond the issues. They really wanted to be part of the syndicate, but I think they will move regardless

9/11/24 7:21:29 AM EDT

+17176291559

➔ Replying to you, 2024-09-11 06:38:23: « Also - what really bothers me is that everyone else will get paid before I do and the company value is... »

I will not let this happen. You would get paid. I'm taking nothing and will make sure that you're paid.

9/11/24 7:22:40 AM EDT

+17176291559

➔ Replying to you, 2024-09-11 06:42:54: « Plus I'm on the hook for \$275k personally that I will need to pay if Paramount doesn't survive whi... »

I don't agree with her Forgone conclusion. If we get this investor issue settled there is many options to reset.

9/11/24 7:22:55 AM EDT

I want to believe you, Daryl I truly do, but I'm not sure we are going to survive this.

9/11/24 7:23:26 AM EDT

+17176291559

➔ Replying to you, 2024-09-11 07:13:21: « I feel like I should be included in the investor payouts. As they get paid I should get paid regardle... »

I want to make you a priority

9/11/24 7:24:11 AM EDT

+17176291559

➔ Replying to you, 2024-09-11 06:54:18: « My reputation in this county has been trashed by association. I'd be afraid to use Paramount on an... »

I don't think your name has been trashed at all. Mine has been. However, there's redemption and I think all that comes back once it is settled. Our side of the story is not out and everyone's listening to the narrative that is being controlled by the other side. We need to change that.

9/11/24 7:24:28 AM EDT

I disagree with you. I'm getting calls from family friends all over people I don't even know.

9/11/24 7:25:08 AM EDT

Literally, my wife is getting grilled because she has to disclose major changes in family finances because they do government contracts

9/11/24 7:25:22 AM EDT

I listen to her on the phone yesterday. Try to not explain this to her boss.

9/11/24 7:25:29 AM EDT

+17176291559

Saying nasty things to you?

9/11/24 7:25:46 AM EDT

+17176291559

➔ Replying to you, 2024-09-11 07:25:22: « I listen to her on the phone yesterday. Try to not explain this to her boss. »

I'm sorry. It's terrible

9/11/24 7:26:15 AM EDT

It is terrible, and I truly believe that my reputation is damaged severely

9/11/24 7:27:45 AM EDT

I'm avoiding going to any of her family reunions because I know some of her family is in the investor group or know investors personally

9/11/24 7:32:14 AM EDT

➔ 2024-09-11 07:25:29: « Saying nasty things to you? »

Yes. Everything from a Ponzi scheme to screwing our investors

9/11/24 7:33:01 AM EDT

To be fair there has been calls of support too.

9/11/24 7:36:06 AM EDT

I ignored a text from my uncle in Florida who wanted to know if I was associated with you.

9/11/24 7:38:40 AM EDT

my reputation is inextricably linked to yours.

9/11/24 7:45:44 AM EDT

I want to talk with you this morning please.

9/11/24 7:59:27 AM EDT

I also want you to know that in spite of all of this, I still believe in you and what I said to you a couple of weeks ago is still the same — I want to get all of this behind us and I still want to work with and for you in the future.

9/11/24 8:02:03 AM EDT

I just want to make sure that I'm given priority consideration in all of this.

9/11/24 8:03:52 AM EDT

so, I have exec team meeting and senior leadership team meetings today — I need to talk with you to understand our current position and our belief for the short term future. Please make this a priority in your schedule as our people need to hear from us.

9/11/24 8:05:53 AM EDT

please give me at least 30 minutes

9/11/24 10:05:07 AM EDT

I need to discuss the following with you asap please

9/11/24 10:05:08 AM EDT

- Investor law suit update
- Orrstown
- True/other funding
- Dave Charles update (send him the APA?)
- Dennis — talking points/communication
- Superior Lawsuit

9/11/24 10:05:33 AM EDT

Also, Dennis has the following questions:

9/11/24 10:05:34 AM EDT

Today need Transfer of ownership with Steve done  
2) side Agreement on my equity he proposed /promised - I laid out in email  
3) consulting agreement specs that include what he's thinking on HC side. I'll send you requested info now that I'm close with Drew.  
4) what can we do with Orrstown? Something has to be able to be worked with so it doesn't get filed before we have chance to payoff.  
5) on Bitstop engagement how does he want to handle comms with Austin.

9/11/24 10:06:02 AM EDT

I pushed off leadership team meetings till tomorrow so I can get some updates from you here first.

9/11/24 10:31:32 AM EDT (Edited 9/11/24 10:34:06 AM EDT)

From Steve Gernes

Edited

9/11/24 10:31:34 AM EDT

FYI - having 1:1 with Vonda - she shared that Chelsea noted to her that she heard from some Portfolio partners that we are selling Cypress and doing so at a discount because we are desperate. Vonda asked her what partners and she did not share.

9/11/24 10:34:31 AM EDT

+17176291559

That's concerning

9/11/24 10:34:52 AM EDT

From Derek

9/11/24 10:34:55 AM EDT

Currently on with Leigh: Just wanted to pass along that both Jim and Leigh have shared with me that "everyone" feels as if the exec team has completely abandoned them as far as communication goes and they all have been asking for some kind of an update, feel like they're all in the dark, and that morale is at an all-time low.

9/11/24 10:38:00 AM EDT

+17176291559

How can we message to them?

9/11/24 10:38:23 AM EDT

+17176291559

We are terminating the lawsuit tomorrow. Maybe that's a time to message. Prestige will terminate the lawsuit against Paramount. We cannot let that out until we do it which is tomorrow afternoon. Maybe put a message out that you're going to have some positive updates late tomorrow

9/11/24 10:38:46 AM EDT

Already did. But didn't use the word positive.

9/11/24 10:38:57 AM EDT

+17176291559

➔ 2024-09-11 07:25:29: « Saying nasty things to you? »

I'm sorry, Randall. I'm failing you and feel horrible about it. I do believe once this closes out everything rebounds quickly. I'm doing everything to take the bullets and to take the reputational harm.

9/11/24 10:39:07 AM EDT

+17176291559

Loved "I also want you to know that in spite of all of th..."

9/11/24 10:39:21 AM EDT

Ultimately, everybody knows we're not paying anybody and everyone is wondering when it's going to be their last paycheck I've heard those rumors as

9/11/24 10:39:28 AM EDT

Well



9/11/24 10:39:33 AM EDT

+17176291559

➔ Replying to you, 2024-09-11 10:05:08: « Investor law suit update

- Orrstown
- True/other funding
- Dave Charles update (send him... »

Could we talk in an hour?

9/11/24 10:40:09 AM EDT

The investor messaging is not important to them. What is important to them is when we get cash

9/11/24 10:40:23 AM EDT

➔ Replying to you, 2024-09-11 10:05:08: « Investor law suit update

- Orrstown
- True/other funding
- Dave Charles update (send him... »

Yes.

9/11/24 10:57:22 AM EDT

without immediate funding — I think we lose most of our business in the next few days.

9/11/24 10:59:27 AM EDT

we are getting constant calls from customers demanding payment or else.

9/11/24 10:59:37 AM EDT

It's overwhelming

9/11/24 11:03:46 AM EDT

+17176291559

Can you send me a new list of total payments due to merchants in addition to the affiliates?

And then prioritize which need paid ASAP. I'm hopeful to have funding in tomorrow. I just don't want to overpromise.

9/11/24 11:30:05 AM EDT

right now past due rents (rents that were due in August) is \$1.1M

9/11/24 11:30:25 AM EDT (Edited 9/11/24 11:31:25 AM EDT)

rents due in September that are unpaid is \$350k

Edited

9/11/24 11:30:30 AM EDT

does not include Cyprus.

9/11/24 11:32:43 AM EDT

waiting for your call

9/11/24 11:37:55 AM EDT

+17176291559

➔ Replying to you, 2024-09-11 11:30:05: « right now past due rents (rents that were due in August) is \$1.1M »

Still baffling to me. Can you at least send me the spreadsheet as well?

9/11/24 11:38:02 AM EDT

+17176291559

➔ Replying to you, 2024-09-11 11:30:05: « right now past due rents (rents that were due in August) is \$1.1M »

I'm finishing up the termination of the lawsuit and will get on with you shortly

9/11/24 11:42:36 AM EDT

ok. Our normal monthly commission expense recorded on our income statement is about \$8M

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmfg.com, +17179172753

9/11/24 11:43:06 AM EDT

	Actuals April-24	Actuals May-24	Actuals June-24	Actual YTD 2024
<b>Operating Revenue</b>				
Surcharge Revenue	\$ 9,446,496	\$ 9,873,449	\$ 9,417,276	\$ 56,507,753
MoneyTower Network Fees	\$ 18,424	\$ 18,325	\$ 18,274	\$ 116,943
Armored/Vault Reimbursement	\$ 25,053	\$ 23,637	\$ 25,852	\$ 148,276
Interchange Revenue	\$ 1,499,067	\$ 1,593,274	\$ 1,521,967	\$ 9,204,009
ATMs Parts & Supplies -- Sales	\$ 55,263	\$ 41,331	\$ 183,028	\$ 440,929
Branding Revenue	\$ 97,846	\$ 102,820	\$ 103,621	\$ 603,053
Misc. Income	\$ 8,824	\$ 7,117	\$ 6,624	\$ 45,594
Sales Commission Revenue	\$ 14,131	\$ 8,186	\$ 3,397	\$ 36,344
Service Revenue	\$ 489,719	\$ 517,509	\$ 492,360	\$ 2,815,246
Dynamic Currency Conversion	\$ 34,152	\$ 34,065	\$ 35,764	\$ 182,837
Cash Resale Income	\$ 39,077	\$ 44,473	\$ 42,677	\$ 243,516
Video Topper Advertising	\$ 8,310	\$ 12,285	\$ 15,871	\$ 49,097
<b>Total Operating Revenue</b>	<b>\$ 11,734,562</b>	<b>\$ 12,276,271</b>	<b>\$ 11,866,742</b>	<b>\$ 70,473,597</b>
<b>Cost of Goods Sold</b>				
Armored Car Expense	\$ 727,328	\$ 752,499	\$ 675,693	\$ 4,274,403
ATM Management Fees	\$ 645	\$ 715	\$ 645	\$ 3,538
ATMs Parts & Supplies -- Resale	\$ 42,963	\$ 34,315	\$ 140,945	\$ 340,790
Cash Insurance	\$ 68,836	\$ 68,086	\$ 66,734	\$ 409,726
Commission Payments	\$ 7,997,327	\$ 8,363,406	\$ 8,941,454	\$ 48,099,952
Vault Cash Expense	\$ 630,352	\$ 647,692	\$ 613,160	\$ 3,884,514
Data & Communication Fees -- ATMs	\$ 65,007	\$ 66,463	\$ 60,080	\$ 396,735
Maintenance -- First Line	\$ 155,206	\$ 134,906	\$ 147,787	\$ 854,884
Maintenance -- Second Line	\$ 100,863	\$ 107,506	\$ 103,228	\$ 632,648
Finance Business Partner Task	\$ -	\$ -	\$ -	\$ -
Network & Processing Fees	\$ 575,910	\$ 617,596	\$ 591,508	\$ 3,441,201
<b>Total Cost of Goods Sold</b>	<b>\$ 10,346,738</b>	<b>\$ 10,793,796</b>	<b>\$ 10,441,233</b>	<b>\$ 62,308,771</b>
<b>Gross Profit</b>	<b>\$ 1,387,825</b>	<b>\$ 1,482,475</b>	<b>\$ 1,425,509</b>	<b>\$ 8,164,825</b>

9/11/24 11:44:41 AM EDT

## P&amp;L Managed vs Processing

June 2024

	PMG Processing	PMG Managed	PMG Total
Surch Trans Count	1,481,152	1,732,752	3,203,904
Total Trans Count	2,043,773	2,806,921	4,850,692
<b>Operating Revenue</b>			
Surcharge Revenue	\$ 4,583,886	\$ 4,833,389	\$ 9,417,276
MoneyTower Network Fees	\$ -	\$ 18,274	\$ 18,274
Armored/Vault Reimbursement	\$ -	\$ 25,852	\$ 25,852
Interchange Revenue	\$ 713,735	\$ 808,262	\$ 1,521,997
ATMs Parts & Supplies -- Sales	\$ 829	\$ 183,199	\$ 184,028
Branding Revenue	\$ 2,250	\$ 103,371	\$ 105,621
Misc. Income	\$ -	\$ 6,624	\$ 6,624
Sales Commission Revenue	\$ -	\$ 3,397	\$ 3,397
Service Revenue	\$ 236,041	\$ 256,319	\$ 492,360
Dynamic Currency Conversion	\$ 22,697	\$ 13,067	\$ 35,764
Cash Resale Income	\$ -	\$ 42,677	\$ 42,677
Video Topper Advertising	\$ -	\$ 15,871	\$ 15,871
<b>Total Revenue</b>	<b>\$ 5,559,437</b>	<b>\$ 6,307,304</b>	<b>\$ 11,866,742</b>
<b>Cost of Goods Sold</b>			
Armored Car Expense	\$ 2,310	\$ 673,382	\$ 675,693
ATM Management Fees	\$ 59	\$ 645	\$ 645
ATMs Parts & Supplies -- Resale	\$ 599	\$ 140,376	\$ 140,945
Cash Insurance	\$ 137	\$ 66,597	\$ 66,734
Commission Payments	\$ 5,039,055	\$ 3,002,399	\$ 8,041,454
Vault Cash Expense	\$ 3,352	\$ 613,808	\$ 613,160
Data & Communication Fees -- ATMs	\$ 14,522	\$ 45,558	\$ 60,080
Maintenance -- First Line	\$ 300	\$ 147,487	\$ 147,787
Maintenance -- Second Line	\$ 75	\$ 103,153	\$ 103,228
Subcontractors -- COS	\$ -	\$ -	\$ -
Network & Processing Fees	\$ 262,549	\$ 538,959	\$ 591,508
<b>Total COGS</b>	<b>\$ 5,320,928</b>	<b>\$ 5,126,305</b>	<b>\$ 10,441,233</b>
<b>Gross Profit \$</b>	<b>\$ 238,510</b>	<b>\$ 1,186,999</b>	<b>\$ 1,425,509</b>
<b>GP %</b>	<b>4.3%</b>	<b>18.8%</b>	<b>12.0%</b>

9/11/24 11:46:32 AM EDT

aging rent detail emailed to you

9/11/24 12:23:06 PM EDT

1. Dennis has decided to change his role at Paramount and Heller Capital Group Companies to pursue his "Dream" to own and operate his own company.
2. His company is named Fraxtion and offers strategic/advisory consulting services to Paramount, Heller Capital, Margo, and Bitstop.
3. How does this impact Paramount?
  - a. Dennis will give half of his time to Paramount and the other half of his time to the other companies (like he did when he was helping Margo previously).
  - b. Dennis will continue to support Brandon and his team (Randall will be supervisor in HR Software/org chart)
  - c. John Scheck will now report to Brandon
  - d. Dennis will still participate on the executive team at Paramount and attend company functions and meetings.
4. This will take effect on Friday September 13.

9/11/24 12:59:09 PM EDT

Thanks for talking to me. Will you please let me know immediately when you are 100% sure we have True funding? I'd really like to report that to the team and everyone else who is trying to get payment from us.

9/11/24 12:59:23 PM EDT

I won't report amount of funding.

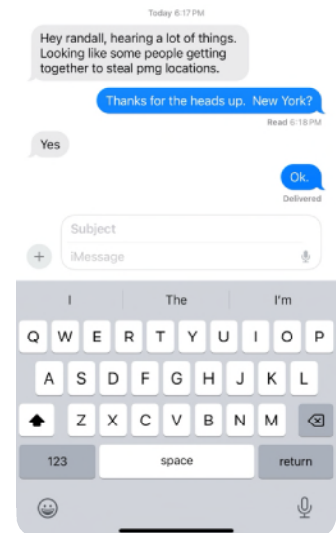
9/11/24 2:35:48 PM EDT

just making sure you saw Jeff email. He is sending docs regardless of your instructions

9/11/24 5:38:24 PM EDT

Sorry to bug you but any update on funding?

9/11/24 6:19:20 PM EDT



9/11/24 6:19:20 PM EDT

Screenshot 2024-09-11 at 6.19.09 PM

9/11/24 6:19:40 PM EDT

From Maz. We need to move fast. Any cash?

9/11/24 6:51:56 PM EDT

+17176291559

I believe by Friday worst case Monday we will have another tranche

9/11/24 6:52:08 PM EDT

+17176291559

I also believe in additional that we can get Charles deal across the finish line. How much Rich do you think we should take with him? Here's what he just sent me.

9/11/24 6:55:04 PM EDT

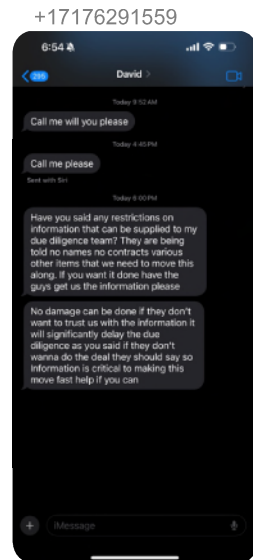
Questioned "I also believe in additional that we can get Charl..."

Messages - +17176291559

Certification in Support Page 314 of 810

+17178242965, randall.leanan@gmail.com, dleanan@ptd.  
net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

9/11/24 6:56:25 PM EDT



9/11/24 6:56:53 PM EDT

Well, we know his history of stealing business from us

9/11/24 6:57:06 PM EDT

At Margo.

9/11/24 6:57:15 PM EDT

But at this point we're likely gonna lose this business anyway so I guess what's the home?

9/11/24 6:57:19 PM EDT

Harm

9/11/24 6:57:23 PM EDT

+17176291559

Don't risk us if we don't sell on the business which he seems to really want

9/11/24 6:57:29 PM EDT

I don't understand why he needs to see it because he's just gonna go directly to them and take this business away from us and not pay us anything for

9/11/24 6:57:46 PM EDT

I don't understand why having the names makes any difference

9/11/24 6:58:27 PM EDT

+17176291559

If that's what he's requesting then I agree. I don't know what his ask is. Can you provide me your judgment on what you think we should withhold and why and I will call him.

9/11/24 6:59:09 PM EDT

I just would ask him why he thinks he needs the names because we want to protect that until we sell, which is not an unreasonable ask given that's what a lot of people done when we purchased.

9/11/24 6:59:34 PM EDT

That said if I knew we were paid up on all these contracts we could protect the business because it's contract. I've right now we're a severe risk.

9/11/24 7:01:05 PM EDT

Tell him we can give him a 10% hold back, but I don't understand why he needs the names and how that's going to help him do any due diligence

9/11/24 7:01:53 PM EDT

It's too his advantage to know and call these people and bring the business over and a sweetheart deal which he knows he can give them because he's going direct and we're out the money

9/11/24 7:02:50 PM EDT

And then he'll use the excuse which has been telling you that these people have been calling him already wanting to switch their business to which is just a bullshit

9/11/24 7:04:15 PM EDT

We can have this all teed up the moment he signs transfers the money will send them everything

9/11/24 7:08:27 PM EDT

We know he's already put out there the fact that we're trying to sell to him

9/11/24 7:08:33 PM EDT

So he's fishing right now

9/11/24 7:23:18 PM EDT

Ali Hamoudeh just called me and told me that we're losing business left and right in New York. He suggested we send out some communication which I'm planning to do and let everybody know what's going on. Will get on that tomorrow.

9/11/24 7:26:46 PM EDT

+17176291559

How much do we owe in New York City?

9/11/24 7:26:59 PM EDT

I don't know. I asked Dennis if we can get that information.

9/11/24 7:29:25 PM EDT

+17176291559

I just called Dave and left a message. I'll let you know when I talk to him. I will resist names.

9/11/24 7:29:39 PM EDT

Thanks. We suspect he's talking with Maya.

9/11/24 7:29:46 PM EDT

Because the information is coming back through Chelsea

9/11/24 7:30:02 PM EDT

+17176291559

I know he is

9/11/24 7:31:31 PM EDT

Is there anyway we can prove it? Because we can cut Maya off

9/11/24 7:33:17 PM EDT

+17176291559

He admitted someone was talking to him, but he wanted to get more information before he could respond back to me today.

9/11/24 7:33:30 PM EDT

She's on a severance program that pays her a lot of money so I'd love to cut her off



Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

9/11/24 7:33:40 PM EDT

But we need proof because she will sue us

9/11/24 7:39:04 PM EDT

Do you think the traunche of funding that will come in? Will be enough to get us current with customers? If so, I'd love to give them a commitment as to when they will be paid. This will go along way.

9/11/24 8:22:00 PM EDT

Maya called to Dennis to say she heard he resigned and that I did too. Interesting is that Austin Haller asked Dennis the same thing.

9/11/24 8:22:27 PM EDT

Not sure the connection but I thought you should know.

9/11/24 8:23:12 PM EDT

+17176291559

How would people know about Dennis?

9/11/24 8:23:33 PM EDT

I don't know. Only person who knew was Kaden.

9/11/24 8:23:43 PM EDT

+17176291559

Ouch

9/11/24 8:24:04 PM EDT

+17176291559

Did he communicate to Kaden not to communicate to anyone?

9/11/24 8:24:58 PM EDT

Yes. And even confronted Kaden when you told me the word as out. He tried to dodge it but it's clear the word got out.

9/11/24 8:25:18 PM EDT

Through him.

9/11/24 8:27:59 PM EDT

We had other leaks too and he was the only one who knew.

9/11/24 10:14:31 PM EDT

+17176291559

Do you or your family went to Eagles game for Monday night?

9/11/24 10:15:00 PM EDT

Would love to go. How many tickets?

9/12/24 6:36:27 AM EDT

Good morning Daryl. I'm spending the day today on the phone talking to employees and acquisition partners. What should I tell them about funding?

9/12/24 8:08:44 AM EDT

Questioned "Good morning Daryl. I'm spending the day today on..."

9/12/24 8:10:40 AM EDT

+17176291559

Randall, I have anxiety about giving you anything given the credibility loss. I definitely think we will have another 1m to 1.5m by Monday.

I also expect true to close out any day

Lastly, there's no reason we can't get Dave across the finish line by early next week which will be 5 to 6m

9/12/24 8:10:45 AM EDT

+17176291559

Sending message from true

9/12/24 8:12:25 AM EDT

thanks. this is helpful.

9/12/24 8:12:36 AM EDT

was the lawsuit closed out yesterday?

9/12/24 8:15:23 AM EDT

+17176291559

No, I said it was being closed out today and terminated

9/12/24 8:15:32 AM EDT

right. Thanks

9/12/24 8:19:35 AM EDT

are you reviewing definitive docs with Charles? If not, we should request so we can get a jump on these.

9/12/24 8:22:26 AM EDT

+17176291559

He did not respond to my voicemail from last evening. I will request such.

9/12/24 8:22:58 AM EDT

+17176291559

Please do not involve Erin Farabaugh or even Steve Gierasch. I think we need to have Sasha do a quick review. Erin will just come up with reasons as to why these lawsuits are such that we should not digest anything right now. Please make sure Dennis stays away from Erin as well as she is just all full of hurdles right now.

9/12/24 8:23:15 AM EDT

+17176291559

We are all trying to find a way to get her to put her hand up and resign

9/12/24 8:24:56 AM EDT

yep. makes sense. Thanks.

9/12/24 8:26:24 AM EDT

May I share True email with Steve Dennis and Derek in exec team meeting this morning?

9/12/24 8:50:39 AM EDT

➔ 2024-09-11 22:14:31: « Do you you or your family went to Eagles game for Monday night? »

how many tickets are available?

9/12/24 9:05:01 AM EDT

ASI shut us down. \$57k over 90. they do armored and maintenance.

9/12/24 9:06:04 AM EDT

correction — they will shut us down tomorrow if they are not paid today

9/12/24 9:06:26 AM EDT

+17176291559

See if we can pay them 20 K today and 37K Monday.

9/12/24 9:06:30 AM EDT

ok

9/12/24 10:42:58 AM EDT

Rabah has been making customer payments for us — \$100k

9/12/24 10:43:17 AM EDT

says he can't get you to text or call him. he feels you owe that to him.

9/12/24 10:43:47 AM EDT

I agree with him.

9/12/24 10:48:35 AM EDT

i explained that you were taking hundreds of texts and calls so he is aware

9/12/24 11:27:45 AM EDT

Please see email from Jeff

9/12/24 12:31:32 PM EDT

Daryl — Tommy and Joe Rents

9/12/24 12:31:36 PM EDT

ACH	
\$	42,085.77
CHECK	
\$	47,600.40

9/12/24 12:31:50 PM EDT

plus \$11k for their service invoice

9/12/24 12:32:15 PM EDT

New York and New Jersey Rents are \$520k

9/12/24 12:55:48 PM EDT

TnT rents are included in the \$520k.

9/12/24 1:06:14 PM EDT

need your response here please especially Tommy and Joe.

9/12/24 1:11:44 PM EDT

New York is where we are having the most problem with competitors

9/12/24 2:36:43 PM EDT

customer messaging for review before we send out:

9/12/24 2:36:44 PM EDT

Dear Valued Partners and Merchants,  
I hope this message finds you well. We are reaching out to provide an important update regarding our ongoing financing restructure, which is now in its final stages. Rest assured, this process is designed to strengthen our financial foundation and will ensure that moving forward, there will be no disruptions in payments. Any pending or past-due payments will be processed and sent out shortly.  
At Paramount Management Group, we remain committed to maintaining the highest levels of service and professionalism. As we navigate these changes, we want to emphasize that our business remains strong. We are resolutely defending our contracts and will continue to protect our company from attrition and competitive threats. Paramount is an industry leader and powerhouse, and we are taking decisive actions to safeguard our position in the market.  
We appreciate your continued partnership and trust in Paramount Management Group. Should you have any questions or concerns, please don't hesitate to reach out to us directly.

9/12/24 2:41:05 PM EDT

I'm going to modify the wording here a little to tone it down but wanted your thought on the general concepts — financing restructure, upcoming payment and defending our contracts.

9/12/24 3:45:35 PM EDT

cord is reaching out to our dispensaries to take advantage of our weakness.

9/12/24 3:52:02 PM EDT

+17176291559

So sorry, in the middle of terminating this lawsuit. Not seeing messages.

9/12/24 4:01:42 PM EDT

Liked "So sorry, in the middle of terminating this lawsuit..."

9/12/24 4:17:02 PM EDT

see the email that Jeff just sent. Looks like Jerry's attorney is fighting the dismissal

9/12/24 4:17:50 PM EDT

they included a text from you to Jerry in the docs

9/12/24 4:19:29 PM EDT

+17176291559

Yes we are good. I approved text before sending

9/12/24 4:19:48 PM EDT

did you get it dismissed or will this extend it?

9/12/24 4:22:10 PM EDT

i guess more importantly will this further delay True?

9/12/24 7:35:44 PM EDT

+17176291559

Spoke to Dave. He's stating that he already has the names of all customers as they were on the one spreadsheet we sent. I don't know if I inadvertently sent it or someone else did. He said he's in a non-circumvent nine disclosure position. He is hell-bent on getting a steel done ASAP and stating this is the only thing holding it up. At this point if he has the names, I suppose the risk is not high. Can we give him immediate access to the portal? Just kill his credentials after a day or two? And he also said he needs about 100 contracts. He said this is the only thing remaining and we can settle by early mid next week unless we don't get these.

9/12/24 7:37:00 PM EDT

By giving him access I think we give him access to all of our terminals but I will find out Regardless we will make this happen.

9/12/24 7:37:17 PM EDT

+17176291559

Well, we really should partition it. Is there any other options?

9/12/24 7:37:25 PM EDT

I gave Sasha a heads up on doc review so she is ready.

9/12/24 7:37:37 PM EDT

➔ 2024-09-12 19:37:17: « Well, we really should partition it. Is there any other options? »

I don't know. I need to ask tomorrow

9/12/24 8:16:16 PM EDT

Eagles tickets available? If so how many?

9/12/24 8:36:24 PM EDT

+17176291559

You have all sex

9/12/24 8:36:27 PM EDT

+17176291559

Six

9/12/24 8:36:50 PM EDT

Cool. Thanks! Ask Rose for them?

9/12/24 8:36:52 PM EDT

+17176291559

You can also have my two on the 10 large line if you want, which would be eight, but they do not have passes into the touchdown club. Let me know if if you want.

9/12/24 8:36:59 PM EDT

+17176291559

➔ Replying to you, 2024-09-12 20:36:50: « Cool. Thanks! Ask Rose for them? »

Yes

9/12/24 8:37:02 PM EDT

Ok.

9/12/24 8:37:12 PM EDT

+17176291559

Let me know if you want the other two if not, I'm gonna give them more

9/12/24 8:37:14 PM EDT

THANK YOU

9/12/24 8:37:15 PM EDT

+17176291559

Away

9/12/24 8:37:26 PM EDT

I don't want the other two

9/12/24 8:37:29 PM EDT

Just the six

9/13/24 7:37:43 AM EDT

Good morning Daryl. What does our cash situation look like today?

9/13/24 7:38:27 AM EDT

We have a massive amount of customers who are threatening to leave if they aren't paid.

9/13/24 7:41:57 AM EDT

+17176291559

I should have a minimum of 500 K. Waiting for wire to hit. I just forwarded you an email for context

How can we prioritize that 650 K today?

9/13/24 7:42:02 AM EDT

+17176291559

Did you get David Charles everything?



9/13/24 7:42:07 AM EDT

+17176291559

Or will the team first thing this morning

9/13/24 7:42:45 AM EDT

Which \$650k are you referring to? New York payments?

9/13/24 7:43:13 AM EDT

→ 2024-09-13 07:42:02: « Did you get David Charles everything? »

Working on it. Sent email to Vonda last night and asked her to get this together today.

9/13/24 7:43:32 AM EDT

+17176291559

No, I'm stating you should have 650 K later today to pay whoever

9/13/24 7:43:35 AM EDT

+17176291559

Need to prioritize it

9/13/24 7:43:48 AM EDT

+17176291559

Maybe 750 K

9/13/24 7:44:00 AM EDT

→ 2024-09-13 07:42:07: « Or will the team first thing this morning »

They will start first thing. Not sure how long it will take to gather but I will make highest priority

9/13/24 7:44:20 AM EDT

+17176291559

Actually, when I look at Wood in our account, it will be over 800 K

9/13/24 7:44:46 AM EDT

Ok we have a long list of people who have called in and threatened to leave I would guess about \$400k

9/13/24 7:45:01 AM EDT

+17176291559

What's in out account it will be over 800k.

I think we should pay at least one if not, two more of the affiliates for August and just keep the one big guy open and then put the other five 600 towards priority merchant rates

9/13/24 7:45:06 AM EDT

+17176291559

Tents

9/13/24 7:45:41 AM EDT

Ok. Let me take a look we also have some vendors that we need to throw a little cash at to keep them moving

9/13/24 7:46:06 AM EDT

I will get you a summary in an hour or so.

9/13/24 7:55:53 AM EDT

➔ 2024-09-13 07:41:57: « I should have a minimum of 500 K. Waiting for wire to hit. I just forwarded you an email for context

How can we prior... »

I don't see the email?

9/13/24 8:13:35 AM EDT

also, please see Jeff's emails last night.

9/13/24 8:14:21 AM EDT

+17176291559

About Unibank?

9/13/24 8:14:30 AM EDT

+17176291559

I already talked to him and that is a non-issue

9/13/24 8:14:52 AM EDT

yes. just wanted to make sure you saw it in your inbox

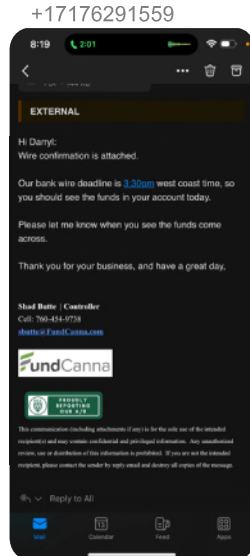
Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

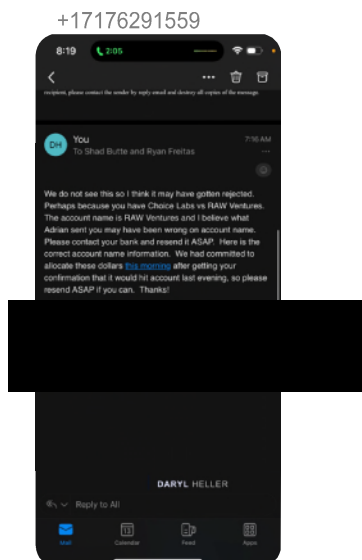
9/13/24 8:16:58 AM EDT

please send the email you referenced about funding today.

9/13/24 8:19:19 AM EDT



9/13/24 8:19:20 AM EDT



Thanks please let me know when the cash is here. I've got the team ready to go.

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

9/13/24 8:32:27 AM EDT

Cypress Payments Outstanding				
	August	July	Total	
Cypress Advantage -0823	\$ 20,551	\$ 28,726	\$ 49,277	
Digital Music Systems	\$ 127,796	\$ 124,340	\$ 252,136	
Pride Vending NW	\$ 272,730	\$ 324,902	\$ 597,632	
Progressive ATM / WATM	\$ 188,525	\$ 67,085	\$ 255,610	
			\$ 1,154,656	
Angus Arcades LLC		\$ 31,392		
Beyer & Brown Inc.		\$ 53,258		
BTM Vending		\$ 130,773		
Cash Money ATMs, LLCs		\$ 46,458		
Gator Coin II, Inc.		\$ 23,443		
Hawkeye Gaming		\$ 69,501		
Mobile Cash Solutions		\$ 120,460		
N2 Amusements		\$ 57,802		
Progressive ATM / WATM		\$ 67,085		
Quality Data Systems		\$ 29,253		
WATM		\$ 141,298		
West Coast Amusements		\$ 29,394		
			\$ 800,116	
Totals	\$ 609,603	\$ 1,345,169	\$ 1,954,772	

9/13/24 8:32:45 AM EDT

here is the Cypress detail. Not sure what you are thinking we should get out.

9/13/24 8:52:11 AM EDT

Are you able to push back on Orrstown now?

9/13/24 8:56:07 AM EDT

+17176291559

I pushed the shit out of them.

9/13/24 8:56:19 AM EDT

Laughed at "I pushed the shit out of them."

9/13/24 9:08:54 AM EDT

just emailed PAI access to Cypress to you. I can send directly to Dave if you prefer.

9/13/24 9:14:44 AM EDT

i will send through our DD channel to Dave's person now

9/13/24 9:19:35 AM EDT

Hi Randall, it's Bob Horst. We need to address the outstanding rents. I know there's all kinds of stress with these lawsuits, but we need to come up with a plan. I cannot continue to carry on as is without payments. Let's talk or meet.

Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

9/13/24 9:22:16 AM EDT

I have \$670k of must go payments following:

9/13/24 9:22:53 AM EDT

approx

9/13/24 9:23:16 AM EDT

TNT	FLM/SLM	10,505	Approved
TNT	August R&C Checks	24,000	Approved
TNT	August R&C ACH	24,000	Approved
CAI	Consulting Payment	3,600	Approved
Maritech	July/August ACH	5,560	Approved
P304644	?	?	Approved
Mozika	July/August ACH	7,957	
ATM UP	ACH	35,000	
Pelican Tunes	?	7,191	
Zeiset	Corporate Office	2,250	Approved
VCMG	July/August ACH	59,542	
JAUSA	July R&C Check	3,183	
Cash To Go	July/August ACH	11,000	
Spreadsheet R&C	ACH	281,523	
Spreadsheet R&C	Check	68,616	
Spreadsheet Loaders	ACH	11,266	
ATM Gurus	ACH	3,000	
Safe & Reliable	ACH	10,000	
GenMega	ACH	5,000	
NorthCal	ACH	6,000	
Wireless4UData	ACH	5,000	
Burroughs	ACH	5,000	
Cennox	ACH	10,000	
DPL	ACH	20,000	
United Armored	ACH	25,000	
Mid South	ACH	25,000	
		669,193	

9/13/24 9:57:41 AM EDT

Daryl, can we get official wording from legal as to the closing if this case that we can share with others who ask?

9/13/24 10:08:45 AM EDT

Mike shrayef is telling me that there are teams of people calling on all of our customers in New York.

9/13/24 10:09:59 AM EDT

fyi

9/13/24 10:10:04 AM EDT

on the phone with him now.

9/13/24 10:10:21 AM EDT

+17176291559

Paying today

9/13/24 10:10:31 AM EDT

\$600K plus?

9/13/24 10:10:38 AM EDT

+17176291559

Tell him we will hold them  
Legally to contract

9/13/24 10:10:54 AM EDT

+17176291559

And will protective rights in agreement

9/13/24 10:10:58 AM EDT

+17176291559

Put the word to him.

9/13/24 10:11:08 AM EDT

+17176291559

I'm sore there is cure periods in south agreement

9/13/24 10:11:18 AM EDT

I am telling him this but he is not everywhere

9/13/24 10:11:56 AM EDT

i would hope but we have so many different agreements from  
acquisitions that I'm not sure.

9/13/24 10:12:16 AM EDT

payment will take care of this and we'll fight the rest legally

9/13/24 10:15:35 AM EDT

did you get the wire?

9/13/24 10:22:17 AM EDT

if we want to pay everyone in New York and New Jersey today. This is  
\$600k plus the \$669 above. There will be some duplication with the  
\$281k of emergency payments that need to go out but not sure how  
much.

9/13/24 10:54:02 AM EDT

Need your guidance here please and cash too 😊

9/13/24 11:10:30 AM EDT

we got served again at Paramount. Don't know what it's about.

9/13/24 11:10:35 AM EDT

is Rose in the office today

9/13/24 11:11:07 AM EDT

one of our employees accepted service.

9/13/24 11:11:38 AM EDT

+17176291559

I am, just bring it over

9/13/24 11:38:55 AM EDT

we placed the document in the lobby

9/13/24 11:41:11 AM EDT

Dave Charles update — his people now have 100 contracts in their email inbox. And they have a PAI login for the Cypress book of business. There is nothing more that is due him from our perspective.

9/13/24 1:12:51 PM EDT

+17176291559

What am I towing Tony? How much is he owed?

9/13/24 1:14:24 PM EDT

+17176291559

Apologies not trying to be short

9/13/24 1:14:29 PM EDT

Liked "Apologies not trying to be short"

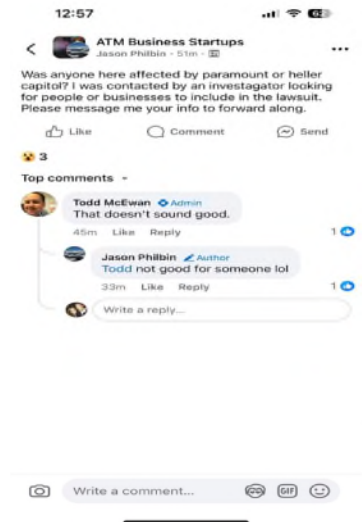
9/13/24 1:18:30 PM EDT

facebook post — Vonda sent to me

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

9/13/24 1:18:42 PM EDT



9/13/24 2:09:21 PM EDT

+17176291559

I see Brandon forwarded money to First National Bank? Please let me know it gets out.

9/13/24 2:09:43 PM EDT

+17176291559

➔ Replying to you, 2024-09-13 13:18:42: (Image)

Crazy

9/13/24 2:09:55 PM EDT

+17176291559

Did we get David Charles access to PAI portal?

9/13/24 2:10:02 PM EDT

+17176291559

We can give them two days and cut them off

9/13/24 2:10:06 PM EDT

+17176291559

How about contracts?

9/13/24 2:16:58 PM EDT

Yes to both



9/13/24 3:12:51 PM EDT

John Scheck sent the Cyprus projection. See your inbox at 3:07 pm

9/13/24 3:31:08 PM EDT



PAI - Paramount Termination Letter (194721707.2).pdf

9/13/24 3:31:10 PM EDT

Daryl, they cancelled our agreement with Cyprus today. David Dove signed it. We have 6 days to convert thousands of terminals. That is impossible to do.

9/13/24 3:32:35 PM EDT

Please call asap

9/13/24 3:50:32 PM EDT

+17176291559

Talk to Sasha?

9/13/24 4:00:00 PM EDT

Yes. She said that we disagree with them that there is a breach in our agreement with them. She will look at the agreement when she gets back to the office. Not sure they can do what they are doing. Our only recourse at this point is to file an emergency injunction. She is willing to provide all the documentation that is needed. We will need a litigator. Jeff??

9/13/24 4:02:05 PM EDT

+17176291559

We do not want Jeff as he's way too expensive. We can use someone else.

9/13/24 4:02:48 PM EDT

Ok. Have you heard anything from Dave Charles?

9/13/24 4:03:18 PM EDT

+17176291559

He's called me back in five minutes

9/13/24 4:23:20 PM EDT

+17176291559

He's going to review with his team. He wants me to send a letter. Are you OK with that?

9/13/24 4:23:32 PM EDT

+17176291559

The letter says we didn't cure the breach. Or respond within the cure.. Again we did respond within the cure.

9/13/24 4:25:05 PM EDT

No, they sent us a letter. We did not respond to it demanding that we provide audit of our record.

9/13/24 4:25:37 PM EDT

OK with sending the letter.

9/13/24 4:25:38 PM EDT

+17176291559

Why did Sasha not respond with a rejection to it?

9/13/24 8:37:25 PM EDT

Did you see lawsuit from Jerry against you ? Email from Jeff. I assume this will further delay funding?

9/13/24 8:41:23 PM EDT

+17176291559

I'm the one that sent it to him. Gerry is now telling him that he's going to discontinue it.

9/13/24 8:41:41 PM EDT

Why is he doing this?

9/13/24 8:42:10 PM EDT

+17176291559

It's fucking insanity. Because he's not telling anyone the truth. He's telling everyone he wants to settle, but then did this. We're trying to figure it out. His actions are incongruent with this communication.

Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.  
net, +17179175670, randall.leanman@paramountmgrp.com, +17179172753

9/13/24 8:42:49 PM EDT

This just harms everyone. Doesn't he realize this?

9/13/24 8:43:44 PM EDT

Will this give our funders pause again?

9/14/24 8:50:23 AM EDT

#### Dennis Talking points

1. Heller Capital needs Dennis' expertise in strategic and advisory services across the portfolio including Heller capital, Paramount, Bitstop, and others
2. So that he can effectively manage and bill for services he established a new entity for this purpose.
3. How does this impact Paramount?
  - Dennis will give half of his time to Paramount and the other half of his time to the other companies (like he did when he was helping Margo previously).
  - Dennis will continue to support Brandon and his team (Randall will be supervisor in HR Software/org chart)
  - John Scheck will now report to Brandon
  - Dennis' office and business address will be at Paramount
  - Dennis will still participate on the executive team at Paramount and attend company functions and meetings.

9/14/24 8:50:37 AM EDT

+17176291559

Thank you

9/14/24 8:56:07 AM EDT

+17176291559

I'm really concerned about the PAI termination letter. What occurred late yesterday with it?

Please manage these as I need you to manage it given I am 24/7 with lawsuits and funding.

Options

- 1) Legally force PAI to give us more time
- 2) move Cyprus from PAI contract with CDS to our direct contract with CDS. I don't think CDS can stop that.
- 3) have CDS provide terminal identification numbers to cash depot has he could convert it right away
- 4) Do injunction
- 5) allow David Charles to call David, Dove and Broker deal for two or three years with PAI. David says he think he could do it with David Dove. Not sure. He would be willing to commit to a two or three year agreement so that PAI would not lose the business, and he thinks David would be motivated by this. Especially because cypress agreements are w us and we will likely legally hold a lot of the business.
- 6) other

We also need a contact FIS to try to move these under a direct contract or another ISO

9/14/24 8:57:51 AM EDT

I asked Sasha to draft a letter for our review Monday morning. I asked Steve to begin transfer of CDS terminals to our direct relationship with CDS. He is calling me this morning about it.

9/14/24 8:58:12 AM EDT

Agree with the actions and I will run with it.

9/14/24 8:59:35 AM EDT

What is status of Charles DD and acquisition?

9/14/24 9:00:13 AM EDT

+17176291559

He thinks he could close Wednesday, but this clearly is an obstacle we need overcome together

9/14/24 9:00:28 AM EDT

Ok. Did we get docs yet?

9/14/24 9:00:59 AM EDT

+17176291559

If we get any pushback from CDS, we need to come up with a strategy. It could be that we sign a two year agreement for these locations so the revenue secure. If not, it's going to go to a competitor We could tell them.

9/14/24 9:01:12 AM EDT

+17176291559

His legal was out Thursday and Friday. She's coming back Sunday and working on agreements.

9/14/24 9:01:52 AM EDT

➔ 2024-09-14 09:00:59: « If we get any pushback from CDS, we need to come up with a strategy. It could be that we sign a two year agreement for ... »

This is actually good timing because we gave them notice that our agreement was expiring the end of November and that we were considering taking the business elsewhere so if we keep it with them and our existing business for another 2 to 3 years, I think we might be able to pull something off

9/14/24 9:02:06 AM EDT

+17176291559

➔ 2024-09-14 09:00:59: « If we get any pushback from CDS, we need to come up with a strategy. It could be that we sign a two year agreement for ... »

Liked "This is actually good timing because we gave them ..."

9/14/24 9:02:10 AM EDT

+17176291559

We need answers Monday on that

9/14/24 9:02:27 AM EDT

+17176291559

I would not offer him exclusivity on these locations initially unless we have to. I would just try to renew the agreement and move these over.

9/14/24 9:02:37 AM EDT

+17176291559

David definitely thinks that's our best route and should be relatively easy to do

9/14/24 9:03:42 AM EDT

Agreed. The only hurdle is the FIS terminals. We may need to get an injunction for those.

9/14/24 9:04:05 AM EDT

+17176291559

David Charles said that Steve has a relationship with FIS? Can you tell me how much GP approximately is generated with the FIS locations?

9/14/24 9:04:06 AM EDT

Liked "I would not offer him exclusivity on these locatio..."

9/14/24 9:04:11 AM EDT

+17176291559

Maybe we just have Charles quickly focus on those?

9/14/24 9:04:24 AM EDT

Yes. Good idea.

9/14/24 9:04:26 AM EDT

+17176291559

Charles would be willing to make those locations whole and pay the back rent as well

9/14/24 9:04:45 AM EDT

+17176291559

Need to get those locations, the revenue generated and the GP generated carved out over the weekend

9/14/24 9:04:46 AM EDT

The issue with exclusivity is that we currently have this in our existing CDS document for anything that is moved to them. We're not allowed to takeoff unless we lose the location.

9/14/24 9:05:17 AM EDT

+17176291559

Well, once we sell it, it should break that. I think we do it two year agreement as David would probably be comfortable with that.

9/14/24 9:05:30 AM EDT

Ok

9/14/24 9:16:00 AM EDT

➔ 2024-09-14 09:04:05: « David Charles said that Steve has a relationship with FIS? Can you tell me how much GP approximately is generated with... »

will find out.

9/14/24 9:19:40 AM EDT

will this new Jerry lawsuit further delay True?

9/14/24 9:20:19 AM EDT

+17176291559

I don't know, I hope not

9/14/24 9:20:43 AM EDT

agreed

9/14/24 9:36:09 AM EDT

Does Dave Charles believe we breached our Cypress agreement with PAI ?

9/14/24 9:36:14 AM EDT

He has a copy of it

9/14/24 9:38:00 AM EDT

If not, we could strike a conditional sale with no \$ exchanged and let him run after PAI CDS with his legal.

9/14/24 9:38:14 AM EDT

So he would be the owner Monday.

9/14/24 9:38:36 AM EDT

Thinking of this, if CDS does not play ball with us which I'm worried they won't

9/14/24 9:38:50 AM EDT

Be interested to know how Dave Charles would've interpreted this agreement if he was the processor

9/14/24 9:45:23 AM EDT

This would put him in the driver seat on the processing contract and may give him more comfort as he'd be negotiating it, and we would not be negotiating on his behalf

9/14/24 9:47:12 AM EDT

My gut tells me that CDS and PAI are going to collude together to impact us negatively. That's why I am worried. I will continue to push on this conversion aspect, but want to be ready very quickly with a plan that we can implement

9/14/24 9:53:57 AM EDT

Because in CDS is mind if they agree with PAI and not convert this to a they'll keep the business anyway through PAI.

9/14/24 9:54:52 AM EDT (Edited 9/14/24 9:55:27 AM EDT)

I am moving forward as if this will not be the case and CDS will convert to us, but just wanting to be ready and would help to know if Dave Charles thinks we are in breach because if he doesn't that gives us more ammunition

Edited

9/14/24 10:04:05 AM EDT

+17176291559

I'll ask him. He told me days ago that the PAI contract that Cypress signed is not a good one. He was blaming Samantha for it.

He does think we have some leverage, but I've not gotten into those specifics

9/14/24 10:04:23 AM EDT

+17176291559

You're stating we would assign our PAI and CDS agreement to him? Does our PAI contract allow us to assign it?



9/14/24 10:05:36 AM EDT

Yes, I'm suggesting we are sign everything to him now. He doesn't have to give us any money at this moment. He goes and fights them and is able to control the conversion process in a way that works best for him. We did not need PAIs permission to take on these agreements so I don't know I have to look at it

9/14/24 10:06:15 AM EDT

He will have much more power than we are able to muster, especially if we're fighting CDS and PAI at the same time because I can see it now they'll get into this while we need legal to review and approve and I'll drag it out and will be dead

9/14/24 10:10:42 AM EDT

Then maybe he Fronts us another million dollars now and settles up with us after the dust clears and he knows what he's got based on the multiples we agreed

9/14/24 10:12:04 AM EDT

Asking Sasha if we have assignability

9/14/24 10:22:57 AM EDT

The more I think about it the more I like this angle. Because it accomplishes everything we want as quickly as we can get it done.

9/14/24 10:23:25 AM EDT

And put Dave Charles in the driver seat to remedy and resolve for which he has much more power than we do

9/14/24 10:24:57 AM EDT

+17176291559

It probably would've been Samantha getting assignment permission from PAI. Who would certainly be in our definitive agreements

9/14/24 10:41:12 AM EDT

Section 5.02 No Conflicts; Consents. The execution, delivery and performance by Owner of this Agreement and the other Transaction Documents to which Owner is a party, and the consummation of the Transactions contemplated hereby and thereby, do not and will not: (i) conflict with or result in a violation or breach of any provision of any Law or Governmental Order applicable to Owner; or (ii) require the consent, notice or other action by any Person under any Contract to which the Owner is a party. No consent, approval, Permit, Governmental Order, declaration or filing with, or notice to, any Governmental Authority is required by or with respect to Owner in connection with the execution and delivery of this Agreement and the other Transaction Documents and the consummation of the Transactions contemplated hereby and thereby.

9/14/24 10:41:20 AM EDT

there is nothing

9/14/24 10:42:44 AM EDT

maybe we get Charles to purchase for an additional \$1.5M now. He cures past rents and handles everything from here. When the dust settles — 6 months? we true up

9/14/24 10:43:25 AM EDT

so he is only out  $1.7 + 1.5 = 3.2$  and he controls his destiny

9/14/24 10:49:45 AM EDT

Neither Party may assign any of its rights under the Agreement, voluntarily or involuntarily, whether by merger, consolidation, dissolution, operation of law or any other manner, without the other Party's prior consent, which consent shall not be unreasonably withheld. Notwithstanding the foregoing, either Party may assign this Agreement to an entity that controls, is controlled by, or is under common control with such Party, or to any entity that acquires all or a substantial portion of such Party's business, in which case the other Party's prior written consent is not required.

9/14/24 10:50:06 AM EDT

this is in the PAI agreement. no consent needed if selling majority of business.

9/14/24 10:50:22 AM EDT

but consent shall not be unreasonably withheld

9/14/24 10:51:31 AM EDT

sasha thinks that this language does not survive in the event of a termination.

9/14/24 11:21:53 AM EDT

We get no advocacy

9/14/24 11:22:01 AM EDT

Samantha hates us

9/14/24 11:25:31 AM EDT

Their number one customer support person left us

9/14/24 11:25:41 AM EDT

They may be waiting to go somewhere else.

9/14/24 12:14:24 PM EDT

I feel good with the strategy outline this morning. Thanks for your help.

9/14/24 12:18:36 PM EDT

What's the latest on the lawsuit with Jerry? Are you going to get him to pull this back?

9/14/24 12:19:51 PM EDT

Just thinking, maybe we got Dave Charles to give us \$5 million in advance for our entire business and we go into a active due diligence to sell the entire company to him?

9/14/24 12:21:21 PM EDT

This will allow us to get current with everybody and sell a company that has no outstanding obligations

9/14/24 1:55:01 PM EDT

Also I'm sure this new lawsuit will make its rounds to employees and the trade. I need something from our counsel to put out there in response.

9/14/24 1:56:22 PM EDT

+17176291559

Just wait until we see if it's gonna be discontinued

9/14/24 1:56:37 PM EDT

Ok.

9/14/24 1:57:49 PM EDT

Do you think that's likely going to occur?

9/14/24 1:59:13 PM EDT

+17176291559

50-50

9/15/24 7:39:10 AM EDT

Good morning Daryl, sorry to bother you on Sunday morning, but I'm sure you're probably working. Any response from Dave Charles?

9/15/24 7:39:40 AM EDT

Also, did you say you are bringing cash in tomorrow? If so, how much? We are on the verge of losing customers as you know and I wanna make sure I get more payments out to them.

9/15/24 7:40:20 AM EDT

Unfortunately, I'm at the point where I cannot endure this much longer.

9/15/24 7:42:22 AM EDT

+17176291559

I'm sorry randall. What can I do for you? Yes we will have some additional cash Monday. that's all we got paid on Friday

Prioritize upside of Cyprus, how much is there?

Just taking off and will land on Chicago. On flights to west for the next 7 hours

9/15/24 7:44:06 AM EDT

I don't know. I've been thinking a lot last night and this morning about what I should be doing next. I just can't endure the customer calls partner calls employees looking to me for leadership and guidance. If the Jerry lawsuit goes through that set us back weeks. I'm on the hook for 250 K or more personally to the company and I don't see a survival path Under current scenario

9/15/24 7:45:43 AM EDT

+17176291559

Why would funding not cure this? And Charles sale? If asset is cash flow positive then the company is solvent and string.

Text message  
9/15/24 7:47:35 AM EDT

If the sale Dave Charles goes through, and I think that's a big if at this point because of the David Dove thing then I agree we will be ok

9/15/24 7:48:11 AM EDT

Agree that funding would cure this, but I think the Jerry lawsuit will set that back

9/15/24 7:50:06 AM EDT

Plus, if Jerry succeeds, then you are no longer in control of the process

9/15/24 7:50:39 AM EDT

And I fear that it becomes very, very bad for all

9/15/24 7:51:54 AM EDT

I fear that I'm gonna get caught in the middle of the investors and you

9/15/24 7:55:55 AM EDT

I know you need me and our employees need me. And I feel a deep sense of responsibility and care for both

9/15/24 7:59:18 AM EDT

It's just that I am nearing the end of this with the level of personal strength that I can muster. I am deeply saddened to see what it was once a healthy and vibrant company reduced to the level it is now. Our employees and partners are scared and looking to me and I don't know that I can do anything about it.

9/15/24 8:16:14 AM EDT

Are you getting my text messages? I am seeing they're going out as text. Makes me wonder if they're going through?

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

iMessage  
9/15/24 9:14:24 AM EDT

+17176291559

➔ Replying to you, 2024-09-15 07:50:06: « Plus, if Jerry succeeds, then you are no longer in control of the process »

Legal is saying outrageous and very small chance/risk

This claims are outrageous with false accusations and false allegations. They want me to sue him if he does not drop it she says he will be dropping it Monday.

9/15/24 9:14:24 AM EDT

+17176291559

Loved "I know you need me and our employees need me. And ..."

9/15/24 9:14:56 AM EDT

+17176291559

As am I. There is redemption in this.

9/15/24 9:26:39 AM EDT

➔ Replying to you, 2024-09-15 07:50:06: « Plus, if Jerry succeeds, then you are no longer in control of the process »

Liked "Legal is saying outrageous and very small chance/r..."

9/15/24 9:36:09 AM EDT

+17176291559

On flights for a few hours

9/15/24 9:36:34 AM EDT

Ok. Anything out of Dave Charles?

9/15/24 9:37:49 AM EDT

+17176291559

Hit him last night and gave had not responded. Anything in CDS? We need approval from them.

Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

9/15/24 9:38:34 AM EDT

I talked to Steve Gernes yesterday. He felt like this should be something that they would be interested in because they have expressed interest in this before. He reached out to Bryan Bauer yesterday, but Bryan has not yet responded. I told Steve to let me know the moment he hear something.

9/15/24 9:38:58 AM EDT

+17176291559

Push some urgency to or

9/15/24 9:39:37 AM EDT

We have about 1600 terminals on FIS. These are not in breach as they've been being paid directly all along. However, we will need time to convert and need PAI to give us this time. Steve knows the owner personally of these terminals and believes we have a good relationship with him as a result.

9/15/24 9:40:02 AM EDT

➔ 2024-09-15 09:38:58: « Push some urgency to or »

I have

9/15/24 9:40:25 AM EDT

+17176291559

So FIS we can do a direct agreement with quickly?

9/15/24 9:40:38 AM EDT

+17176291559

How Much go comes from those?

9/15/24 9:40:58 AM EDT

No, that would not be the case. It would take at least a month to get our an agreement together with FIS direct. Our best option is to convert.

9/15/24 9:41:12 AM EDT

➔ 2024-09-15 09:40:38: « How Much go comes from those? »

I don't know, but I can find out

9/15/24 9:41:47 AM EDT

+17176291559

Find out how fast they could convert to CDs or cash depot. Does affiliate have resource?

9/15/24 9:41:57 AM EDT

He might have the resource

9/15/24 9:41:58 AM EDT

+17176291559

➔ Replying to you, 2024-09-15 09:40:58: « No, that would not be the case. It would take at least a month to get our an agreement together with F... »

Why can we not sign agreement

9/15/24 9:42:33 AM EDT

Based past experience with other major processors, this generally takes time, but we could call and find out as well

9/15/24 9:43:31 AM EDT

➔ 2024-09-15 09:41:47: « Find out how fast they could convert to CDs or cash depot. Does affiliate have resource? »

I think we could probably do in 30 days but that would be really pushing it but we could bring Dave Charles and the owner and maybe even CDS to bear on this

9/16/24 8:53:14 AM EDT

good morning Daryl — any update on Jerry lawsuit?

9/16/24 8:53:20 AM EDT

Is he withdrawing today?

9/16/24 9:47:09 AM EDT (Edited 9/16/24 9:47:45 AM EDT)

Bryan Bauer is willing to take on the terminals from PAI but needs to run it by their legal. He said he'd need to get PAI to release the TIDs to them.

Edited



9/16/24 9:49:02 AM EDT

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That doesn't make any sense. Why would they have to release TID?

9/16/24 9:49:09 AM EDT

+17176291559

Does that make sense to you? The TID are CDS.

9/16/24 9:49:15 AM EDT

+17176291559

Could they just assign a different TID?

9/16/24 9:49:23 AM EDT

I said the same thing to Steve.

9/16/24 9:49:26 AM EDT

+17176291559

➔ Replying to you, 2024-09-16 08:53:20: « Is he withdrawing today? »

Hoping it he is lying

9/16/24 9:50:12 AM EDT

I'm going to push on this but thinking of having this as part of our legal response to the letter from Sasha just to be sure.

9/16/24 10:31:35 AM EDT

any word out of Dave Charles?

9/16/24 11:30:06 AM EDT

Dave Charles just called me trying to get you and you're not responding. Will you please reach out to him ASAP thanks.

9/16/24 11:31:22 AM EDT

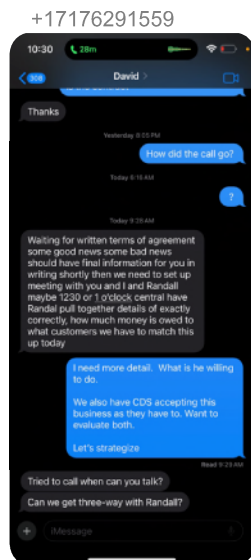
+17176291559

He's saying that? I see one call while im on this legal call

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net, +17179175670, randall.leman@paramountmgrp.com, +17179172753

9/16/24 11:31:28 AM EDT



9/16/24 11:31:59 AM EDT

He said trying to reach you and not getting through so not sure of what he meant by that

9/16/24 11:48:00 AM EDT



9/16/24 1:25:11 PM EDT

just spoke to Dave Charles briefly. He wants to talk to you. How soon are you ready to talk?

9/16/24 1:32:54 PM EDT

+17176291559

15 minutes

9/16/24 1:34:44 PM EDT

Liked "15 minutes"

Messages - +17176291559

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9/16/24 2:09:48 PM EDT

Cypress Payments Outstanding			
	August	July	Total
Cypress Advantage -0823	\$ 20,551	\$ 28,726	\$ 49,277
Digital Music Systems	\$ 127,796	\$ 124,340	\$ 252,136
Pride Vending NW	\$ 272,730	\$ 324,902	\$ 597,632
Progressive ATM / WATM	\$ 188,525	\$ 67,085	\$ 255,610
			<b>\$ 1,154,656</b>
Angus Arcades LLC		\$ 31,392	
Beyer & Brown Inc		\$ 53,258	
BTM Vending		\$ 130,773	
Cash Money ATMs, LLCs		\$ 46,458	
Gator Coin II, Inc		\$ 23,443	
Hawkeye Gaming		\$ 69,501	
Mobile Cash Solutions		\$ 120,460	
N2 Amusements		\$ 57,802	
Progressive ATM / WATM		\$ 67,085	
Quality Data Systems		\$ 29,253	
WATM		\$ 141,298	
West Coast Amusements		\$ 29,394	
			<b>\$ 800,116</b>
<b>Totals</b>	<b>\$ 609,603</b>	<b>\$ 1,345,169</b>	<b>\$ 1,954,772</b>

9/16/24 2:09:53 PM EDT

here is remaining

9/16/24 5:08:50 PM EDT

I sent this to Dave Charles above. He called and asked where his money went and I said somewhat to pay some of this, but you'll need to talk with him about it so he's probably gonna reach out to you.

9/16/24 5:47:37 PM EDT

By the way no response from CDS in spite of repeated requests.

9/16/24 7:48:39 PM EDT

+17176291559

Huge progress with Dave Zook and Gerry . I'm hopefully to get all lawsuits dismissed. Really looking positive.

9/16/24 7:49:06 PM EDT

Awesome! Way to go!

9/16/24 7:49:15 PM EDT

Thanks for letting me know

9/16/24 8:43:52 PM EDT

<https://www.judiciary.senate.gov/press/dem/releases/durbin-senate-democrats-push-ten-largest-bitcoin-atm-operators-to-curb-fraud-against-elderly-americans>

9/17/24 8:10:34 AM EDT

CDS responded last night. They need PAI approval before they will move the terminals.

9/17/24 8:28:52 AM EDT

+17176291559

Okay. I'll talk with Charles. I had already communicated to him that we were not making those payments to merchants given notices and otherwise. I also communicated that we used 500,000 of it for legal expense. Was he pushing you hard on it?

9/17/24 8:29:32 AM EDT

No. I got the feeling he was probing to see if our stories matched

9/17/24 8:30:27 AM EDT

Anything on True?

9/17/24 8:43:53 AM EDT

Also, just a reminder for your thinking that when investors start getting paid that I'd like to be included at the beginning of this process as well. Thanks.

9/17/24 8:44:52 AM EDT

At my age I need to secure my retirement funds and I don't want to be left behind in this thinking.

9/17/24 9:02:08 AM EDT

Also you need to respond to Gierasch text regarding Samantha

9/17/24 9:13:30 AM EDT

Also I would like some face time with you when you are back in town. Evenings are fine too.

9/17/24 9:13:42 AM EDT

Please 😊

9/17/24 11:44:06 AM EDT

also, we need cash today. First Premier is due today and they are cash provider to cannabis locations.

9/17/24 1:00:52 PM EDT

Sorry to pound you but any update from Dave Charles?

9/17/24 1:18:08 PM EDT

Also on superior group — are we clear or do we need to get counsel?

9/17/24 1:20:25 PM EDT

Jeff just sent an email to Erin

9/17/24 1:38:20 PM EDT

+17176291559

Sasha is handling superior. I will reach out to Chris

9/17/24 1:39:10 PM EDT

sasha is not handling this for us. she is only taking service. We need Michigan counsel

9/17/24 1:40:21 PM EDT

+17176291559

We have a settlement. He's waiting for legal to provide the settlement document.

9/17/24 1:40:48 PM EDT

for Sasha to provide? or his legal to provide?

9/17/24 1:45:01 PM EDT

+17176291559

His legal. I just text him. We brokered a deal last week.

9/17/24 1:45:41 PM EDT

Liked "His legal. I just text him. We brokered a deal las..."

9/17/24 2:11:33 PM EDT

Are we permitted to trash ATMs in the warehouse or should we still hold on this project?

9/17/24 4:27:24 PM EDT

Any update on PAI / Cypress?

9/17/24 6:23:16 PM EDT

Looks like superior filed against us. We need to appear in court

9/17/24 6:25:57 PM EDT

+17176291559

What?

9/17/24 6:26:46 PM EDT

See email from Sasha

9/17/24 6:27:05 PM EDT

They're filing for default judgment

9/17/24 6:27:46 PM EDT

+17176291559

I'm literally texting him today. I called his legal Friday. That's just his move until we sign off on the settlement. I've been asking for the paper

9/17/24 6:30:49 PM EDT

So what are we supposed to do?

9/17/24 6:33:45 PM EDT

So Dennis and Steve are also going to get this notice

9/17/24 7:09:56 PM EDT

Any update on Dave Charles and PAI ?

9/17/24 7:35:25 PM EDT

Daryl?

9/17/24 7:40:29 PM EDT

Did the deal fall through?

9/17/24 8:22:44 PM EDT

Daryl please respond.

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9/17/24 10:04:56 PM EDT

+17176291559

W PAI and Charles. It's happening

9/17/24 10:04:57 PM EDT

+17176291559

How much did we pay for cypress?

Text message  
9/17/24 10:06:22 PM EDT

Looking

9/17/24 10:07:50 PM EDT

13.550 M

9/17/24 10:08:35 PM EDT

Are you in person with them?

9/17/24 10:10:14 PM EDT

How much are they offering?

iMessage  
9/17/24 10:14:12 PM EDT

+17176291559

Good calls w both

9/17/24 10:14:13 PM EDT

+17176291559

No calls.

9/17/24 10:14:13 PM EDT

+17176291559

I think we can get 7.5m. We knew we big time over paid

9/17/24 10:14:13 PM EDT

+17176291559

The impairment of base is hurting us

9/17/24 10:14:36 PM EDT

Ok. Any holdback?

9/17/24 10:14:52 PM EDT

What impairment?

9/17/24 10:15:25 PM EDT

The biz has grown.

9/17/24 10:21:54 PM EDT

Closing this week?

9/17/24 10:31:32 PM EDT

+17176291559

Def holdback with all the noise in base

9/17/24 10:31:50 PM EDT

+17176291559

➔ Replying to you, 2024-09-17 22:14:52: « What impairment? »

Affiliates wanting to leave

9/17/24 10:31:55 PM EDT

Ahhh

9/17/24 10:32:03 PM EDT

How much holdback?

9/17/24 10:32:43 PM EDT

And can we close this week?

9/17/24 10:36:53 PM EDT

+17176291559

Agreement coming in morning. I'm sore 20% but we can lower

9/17/24 10:37:31 PM EDT

Ok. Closing on Thursday?



9/17/24 10:42:46 PM EDT

+17176291559

Friday

9/17/24 10:42:56 PM EDT

Ok.

9/17/24 10:42:59 PM EDT

+17176291559

I will definitely meet with you when I get back in town

9/17/24 10:43:05 PM EDT

Liked "I will definitely meet with you when I get back in..."

9/17/24 10:43:17 PM EDT

Do we pay Samantha out of this?

9/17/24 10:43:39 PM EDT

+17176291559

If they pay it right, we would need to pay the full amount, but I don't think they will

9/17/24 10:43:58 PM EDT

+17176291559

Probably partial. I've already reached out to her for a reduce settlement number.

9/17/24 10:44:09 PM EDT

Dennis says we owe her \$4.5M?

9/17/24 10:44:41 PM EDT

4.15

9/18/24 9:18:46 AM EDT

Good morning Daryl — when are you back in town?

9/18/24 10:07:39 AM EDT

any update on Orrstown?

9/18/24 11:29:29 AM EDT

also DLA is hitting us for \$80k payment

9/18/24 11:48:39 AM EDT

please see email — a new lawsuit from Summers Bank demanding \$3.9M

9/18/24 11:48:56 AM EDT

sorry Traditions Bank

9/18/24 11:50:07 AM EDT

how many of these are out there?

9/18/24 11:50:20 AM EDT

seems like we keep getting surprised by these

9/18/24 11:51:48 AM EDT

actually looks like they are demanding \$1.8M plus \$99K

9/18/24 11:53:29 AM EDT

+17176291559

We don't even have a relationship with them. Has nothing to do with Paramount. Send me a screenshot.

9/18/24 11:54:51 AM EDT

they are successor to York Traditions Bank



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9/18/24 11:57:08 AM EDT

+17176291559

Please send the cash connect to definitive agreements to Sasha for review

9/18/24 11:57:27 AM EDT

Questioned "Please send the cash connect to definitive agreeme..."

9/18/24 11:57:40 AM EDT

+17176291559

Cash depot

9/18/24 11:58:11 AM EDT

ok but I don't have them

9/18/24 12:00:32 PM EDT

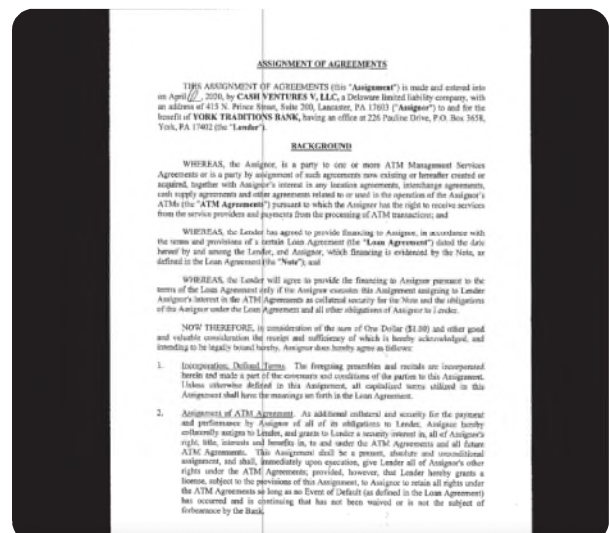
+17176291559

Just sent

9/18/24 12:02:04 PM EDT

got it

9/18/24 12:03:59 PM EDT



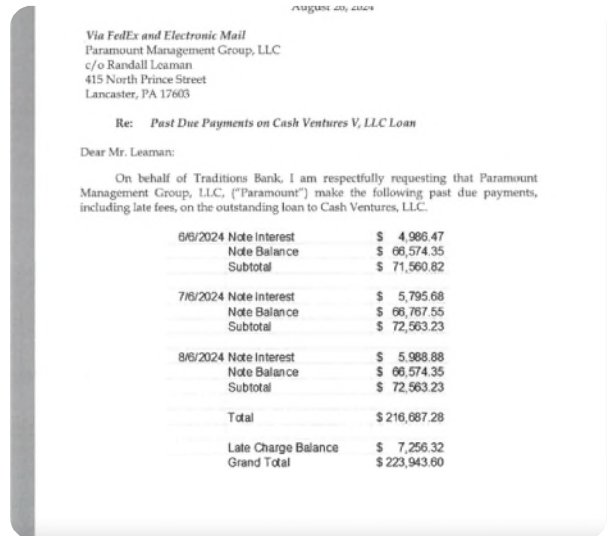
9/18/24 12:04:28 PM EDT

looks like this was assigned to york traditions from Cash Ventures

9/18/24 12:04:51 PM EDT

you signed off on this.

9/18/24 12:17:14 PM EDT



9/18/24 12:37:10 PM EDT

FYI. Questions from employees in finance regarding our troubles. I'm having a company meeting on Friday morning and asked for questions.

9/18/24 12:37:11 PM EDT

I offered to gather the accounting and finance questions together as a group to make individuals feel more comfortable. Please see the below:

- 1 How will Paramount ensure accountability for paying merchants/vendors in the future? Should we expect liquidity to be an ongoing issue?
- 2 Will Paramount be reimbursed, in full, for the operating cash used in 2024 by Heller Capital?
- 3 Do you predict that there will be a shift/change in ownership or structure of Paramount soon?
- 4 Will executive management be returning to any variation of a hybrid in office schedule soon?
- 5 Is executive management concerned about the recent legal actions taken by Prestige claiming Daryl Heller has engaged in scheme to benefit Paramount?

9/18/24 12:37:32 PM EDT

would be great for you to join but I will take care of if you cannot

9/18/24 12:39:00 PM EDT

+17176291559

Can we talk about this in detail tomorrow?. I'm literally in the middle of getting these lawsuits terminated.

9/18/24 12:39:11 PM EDT

yes. that's fine.

9/18/24 12:39:20 PM EDT

+17176291559

➔ Replying to you, 2024-09-17 08:44:52: « At my age I need to secure my retirement funds and I don't want to be left behind in this thinking. »

I got you covered. Add this to the agenda to talk through.

9/18/24 12:39:47 PM EDT

thanks. when are you able to meet tomorrow? I will make it work at any time.

9/18/24 1:24:14 PM EDT

kamy warned me that some attorney is working to gather up customers and partners to file a lawsuit on their behalf.

9/18/24 1:24:26 PM EDT

he was approached.

9/18/24 1:24:31 PM EDT

Just ATMs USA

9/18/24 1:24:44 PM EDT

+17176291559

What customers?

9/18/24 1:25:03 PM EDT

don't know. he's out on facebook or somewhere

9/18/24 1:25:18 PM EDT

Kamy was called (we owe him holdback for the acquisition)

9/18/24 1:25:52 PM EDT

he had other customers calling him to ask what he thought. He told them to ignore this guy

9/18/24 1:26:05 PM EDT

+17176291559

On with PAI again. They are extending 3 days. Deal should be done with Charles by Friday

Try to find out. Likely tied to investors. I hen suits drop this will change he.

9/18/24 1:26:06 PM EDT

for lack of payment

9/18/24 1:26:21 PM EDT

I think it is customers and ATM trade

9/18/24 1:26:29 PM EDT

trade vendors

9/18/24 1:27:14 PM EDT

we owe Kamy \$968k holdback and he is asking when he is going to be paid.

9/18/24 1:27:30 PM EDT

he wants 25% now.

9/18/24 1:27:47 PM EDT

he is working with us and helping to support us with customers.

9/18/24 1:27:52 PM EDT

on the phone with him now.

9/18/24 1:29:11 PM EDT

I told him that I can't give any date but would need to talk to you about this.

9/18/24 1:30:18 PM EDT

i think Samantha is reaching out to him — or Maya

9/18/24 1:31:09 PM EDT

he is not asking for interest.

9/18/24 1:42:34 PM EDT

customer service employees questions:

9/18/24 1:42:34 PM EDT

- 1 How did we get into this situation?
- 2 Do we have a plan to get back on track without this happening again?
- 3 Why did we not notify our customers?
- 4 We weren't given any reason or timeline to tell customers as to how long it will take until they are paid. Can we get some details on this to relay to them?
- 5 How long will this be an issue for?

9/18/24 2:01:06 PM EDT

+17176291559

When is your meeting?

9/18/24 2:01:16 PM EDT

Friday morning at 11 am

9/18/24 4:11:18 PM EDT

Are you back in Lancaster yet? Happy to meet you tonight if you are.

9/18/24 4:25:58 PM EDT

+17176291559

No

9/18/24 5:47:17 PM EDT

Any update on True funding? I know you are tired of me asking but it's really needed

9/18/24 6:50:44 PM EDT (Edited 9/18/24 6:51:30 PM EDT)

What I don't understand about true funding, and some of the other is how they can be ready to fund yet they go silent on us

Edited



9/18/24 6:52:15 PM EDT

+17176291559

I talked to them every single day, Randall

9/18/24 6:52:34 PM EDT

+17176291559

Glad to have you join

9/18/24 6:52:36 PM EDT

I believe you I just don't understand what's happening and it's frustrating

9/18/24 6:52:40 PM EDT

+17176291559

In flights

9/18/24 6:52:50 PM EDT

Understood

9/18/24 6:52:55 PM EDT

+17176291559

Lawsuits. I think dismissal in morning will be huge

9/18/24 6:53:05 PM EDT

OK, cool that's refreshing to hear

9/18/24 6:54:37 PM EDT

It's just that I'm hearing people they can't make their mortgage payments and they're calling us pleading for help

9/18/24 6:57:56 PM EDT

+17176291559

You're saying investors

9/18/24 6:58:45 PM EDT

No, Greg Fabiani, some loaders and some smaller cypress people.

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net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

9/18/24 7:02:24 PM EDT

You come to agreement with Jerry and Zook?

9/18/24 7:02:37 PM EDT

+17176291559

Being papered

9/18/24 7:02:53 PM EDT

Sweet!

9/18/24 7:25:47 PM EDT

Did you get the docs from superior?

9/19/24 8:39:10 AM EDT

good morning Daryl — please see your inbox regarding APA for Cypress  
— please pay special attention to clawback provisions. Some concerning  
concepts.

9/19/24 10:38:27 AM EDT

are we meeting for 1:1 today?

9/19/24 12:19:20 PM EDT

Are you there?

9/19/24 12:19:48 PM EDT

You aren't responding and we need some direction please.

9/19/24 1:38:09 PM EDT

+17176291559

Can you quickly send me the suit filed by Yatooma?

9/19/24 1:39:10 PM EDT

not sure which one this is?

9/19/24 1:39:21 PM EDT

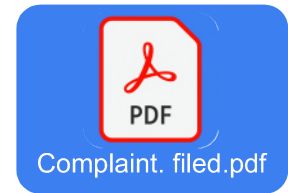
+17176291559

Superior

Messages - +17176291559

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9/19/24 1:39:43 PM EDT



9/19/24 1:39:57 PM EDT

fast enough? 😊

9/19/24 1:55:09 PM EDT

+17176291559

Emphasized “fast enough? 😊”

9/19/24 1:55:15 PM EDT

+17176291559

Is this the original one or the one they just filed?

9/19/24 1:56:08 PM EDT

i think it's the original one. I will verify

9/19/24 1:56:30 PM EDT

+17176291559

How did you find out about something yesterday? Do you have that?

9/19/24 1:57:21 PM EDT

Sasha/Daryl-

In regard to the above matter, attached is a courtesy copy of the following:

- Entry of Default.
- Plaintiff's Motion for Entry of Default Judgment; and
- Notice of Hearing.

A copy of the above pleadings was mailed out via first class U.S. mail to all the defendants.

Please feel free to call if you have any questions or wish to discuss a resolution of this matter prior to the September 25, 2024, hearing on the motion for entry of default judgment.

Frank M. DeLuca, Atty.  
1615 S. Telegraph Rd | Suite 400 | Bloomfield Hills MI 48302  
P: 248-763-8765

9/19/24 1:57:26 PM EDT

email is in your inbox

9/19/24 1:58:57 PM EDT

I don't have these documents but requested

9/19/24 2:11:29 PM EDT



Motion for Default Judgment (with Ex)(filed copy).pdf

9/19/24 2:11:37 PM EDT

here is the most recent. What we received yesterday

9/19/24 2:11:52 PM EDT

hearing is scheduled for next week

9/19/24 2:12:03 PM EDT

September 25

9/19/24 2:21:33 PM EDT



Employee Meeting -- September 19 2024.pdf

9/19/24 2:21:33 PM EDT

need you to review and bless/change

9/19/24 2:42:16 PM EDT

From Clatworthy

9/19/24 2:42:18 PM EDT

We are up against a stop funding EOD unless we receive some payment today and a plan for the rest of the June payment

9/19/24 3:11:05 PM EDT

Clatworthy said they need payment by 4:45 today or they shut off

9/19/24 3:11:14 PM EDT

Emphasized "Clatworthy said they need payment by 4:45 today or..."

9/19/24 3:11:29 PM EDT

+17176291559

I'm talking to him via text

9/19/24 3:11:35 PM EDT

Ok. Cool.

9/19/24 3:18:42 PM EDT

any cash you can transfer today to pay customers? we are getting hammered that they are going to take out machines.

9/19/24 3:18:55 PM EDT

they are now expecting August payments and not getting them

9/19/24 3:19:17 PM EDT

we still have July payments outstanding

9/19/24 3:19:34 PM EDT

\$ 747,530 July Rent Payments  
\$ 945,312 August Rent Payments

9/19/24 4:14:02 PM EDT

are we closing tomorrow on Cypress?

9/19/24 7:58:00 PM EDT

+17176291559

Lots of negotiations today. If not tomorrow tomorrow definitely Monday. I've been working nonstop with PAI so we don't get shut off tonight which were good. we should get 1.5 million of cash from David settlement tomorrow Monday and then another 1.2 million in 30 days

9/19/24 7:58:23 PM EDT

Loved "Lots of negotiations today. If not tomorrow tomorr..."

9/19/24 7:58:35 PM EDT

Thanks for letting me know. Great job !

9/19/24 8:16:32 PM EDT

I assume the 1.5 million comes to us so we can pay our customer commissions that are aging and they are paying cypress customers at closing?

9/20/24 8:04:11 AM EDT

➔ Replying to you, 2024-09-19 14:21:33: « need you to review and bless/change »

Good morning Daryl. Assuming you cannot join the company meeting this morning at 11 to talk to our employees will you please review this and let me know if you have any changes thanks

9/20/24 8:50:01 AM EDT

I want to be sure that I'm speaking accurately here

9/20/24 9:03:50 AM EDT

if we haven't signed the deal for Cypress — I won't say anything about that.

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9/20/24 9:07:34 AM EDT

+17176291559

Definitely do not say anything about Cyprus. We cannot have that on the street.

9/20/24 9:07:43 AM EDT

yep.

9/20/24 9:07:57 AM EDT

+17176291559

➔ Replying to you, 2024-09-19 14:21:33: « need you to review and bless/change »

Looking at this in next 20 minutes

9/20/24 9:08:04 AM EDT

ok. cool.

9/20/24 9:23:49 AM EDT

Not sure if this is helpful or not but here is what I'm working with to track all of the get-well tasks related to returning Paramount to fiscal health

9/20/24 9:23:55 AM EDT

Cash Project Tracking			
9/20/24			
Status Key		Urgent -- In Progress	
		Urgent -- Status Unknown	
Cash Out		Investors/Loan Holders	Cash In Capital Raise
\$	1,000,000	Superior	\$ 2,700,000 Cyprus Sale
\$	50,000,000	Prestige Investors	\$ 8,000,000 True Funding
\$	-	Brandt	\$ 57,000,000 Debt and Equity partnership
\$	600,000	Dash Holdings	\$ 20,000,000 Recapitalization
\$	2,000,000	Square	\$ 12,000,000 Perma Owell
\$	1,900,000	Tradition Bank (Cash Ventures)	\$ 10,000,000 Hedon Equity
\$	-	Steward Capital Holdings	\$ 11,000,000 Other Liquidity events
\$	-	Autismpro Holdings	
\$	-	Golden Gate	\$ 120,700,000 Total Incoming
\$	1,400,000	Orionone	
\$	2,900,000	FHB LOC	
\$	99,300,000	Total	\$ (42,402,020) Net Owing/(Surplus)
Cash Out		Acquisition Holdbacks	
\$	1,400,000	Ray Davis	
\$	977,040	Kang (Just a Bbs USA)	can we pay 25% now?
\$	4,150,000	Samantha	
\$	653,349	Rabash Projects	
\$	7,181,211	Total	
Cash Out		Aging Operating	
\$	1,050,544	Merchant Payments	
\$	175,000	Purchase Payments	
\$	3,098,026	Trade Payables	
\$	130,000	Randall Credit Card	
\$	60,000	Dennis Credit Card	
\$	700,000	CashConnect Pull Back	
\$	5,816,369	Total	
\$	72,297,389	Total Owing	

9/20/24 9:24:08 AM EDT

I realize investor numbers are wrong but just my best guess.

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9/20/24 9:30:12 AM EDT



Employee Meeting -- September 19 2024 v2.pdf

9/20/24 9:30:12 AM EDT

use this one.

9/20/24 10:00:32 AM EDT

+17176291559

Responding now

9/20/24 10:01:09 AM EDT

+17176291559

Please quickly send Jeff a email that you are processing payment. This should be last meaningful invoice as we used them zero since Tuesday. Just need to keep the happy for the future int he event we need them.

9/20/24 10:01:33 AM EDT

Liked "Please quickly send Jeff a email that you are proc..."

9/20/24 10:01:42 AM EDT

do you want this to go out today or Monday?

9/20/24 10:02:03 AM EDT

+17176291559

Just say you sent to finance to process

9/20/24 10:02:10 AM EDT

+17176291559

We can decide later today

9/20/24 10:02:30 AM EDT

+17176291559

I will have review of your docs shortly



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9/20/24 10:02:39 AM EDT

+17176291559

Multiple calls with Charles and PAI already this morning

9/20/24 10:03:00 AM EDT

+17176291559

Just need to keep confidential as I dont want Samantha getting wind of it even though she already may have

9/20/24 10:03:10 AM EDT

Liked "Just need to keep confidential as I dont want Sama..."

9/20/24 10:13:55 AM EDT

\$ 229,702 July Checks  
\$ 477,530 July ACH

9/20/24 10:14:17 AM EDT

this is what is aging for customers only for july. Can we get these out today?

9/20/24 10:21:55 AM EDT

➔ Replying to you, 2024-09-20 09:30:12: « use this one. »  
meeting in about 30 minutes. need your feedback please

9/20/24 10:29:09 AM EDT

+17176291559

See email as I am working on it

9/20/24 10:29:19 AM EDT

+17176291559

Are you giving this document or using as talk points?

9/20/24 10:29:28 AM EDT

using as talking points only.

9/20/24 10:34:16 AM EDT

➔ 2024-09-20 10:29:09: « See email as I am working on it »

I don't see the email.

9/20/24 10:44:14 AM EDT

got it.

9/20/24 10:44:26 AM EDT

are you able to join this call and talk to this stuff?

9/20/24 10:45:14 AM EDT

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I am with Our attorneys on this settlement. So painful. I can drop and come in at end if you feel of value.

9/20/24 10:45:20 AM EDT

i think it will only be 10 minutes

9/20/24 10:45:34 AM EDT

i do as you understand better and I think it will be good for them to hear you.

9/20/24 10:45:40 AM EDT

+17176291559

Or let them absorb and set up a q/a on Monday afternoon or Tuesday

9/20/24 10:46:18 AM EDT

+17176291559

If you feel of value, I can drop and call in remote from my wireless as I dont have video access

9/20/24 10:46:23 AM EDT

+17176291559

LMK and I will keep this

9/20/24 10:46:23 AM EDT

please.

9/20/24 10:46:50 AM EDT

i think this is essential. again, only 10-15 minutes of your time.

9/20/24 10:47:02 AM EDT

no worries about video access.

9/20/24 10:47:30 AM EDT

just sent you invite.

9/20/24 10:47:54 AM EDT

so you will join?

9/20/24 10:48:38 AM EDT

I don't think we need another Q&A as I already asked of that in advance of this meeting.

9/20/24 10:49:54 AM EDT

you planning to join?

9/20/24 10:52:26 AM EDT

please?

9/20/24 10:53:40 AM EDT

+17176291559

Yea

9/20/24 10:54:00 AM EDT

+17176291559

So the questions are what employees have asked?

9/20/24 10:56:01 AM EDT

Those are the additional questions I try to cover everything else in body of the message

9/20/24 10:56:10 AM EDT

I can talk to the customer notification issue

9/20/24 10:59:18 AM EDT

essentially they want to know what happened to get us into this mess, what we are doing now to fix it and how can we prevent this in the future

9/20/24 11:02:01 AM EDT

we are on and waiting for you. let me know when you are on

9/20/24 11:24:33 AM EDT

+17176291559

I can take a few questions if you like?

9/20/24 11:24:49 AM EDT

+17176291559

How many people are on this call?

9/20/24 11:25:04 AM EDT

67

9/20/24 11:25:13 AM EDT

someone started a read.ai

9/20/24 11:25:19 AM EDT

so this was all recorded.

9/20/24 11:25:22 AM EDT

+17176291559

All employees. My bad. I thought exec team

9/20/24 11:25:22 AM EDT

chris powell.

9/20/24 11:25:27 AM EDT

i just saw this.

9/20/24 11:25:29 AM EDT

yes.

9/20/24 11:25:46 AM EDT

+17176291559

Ouch. Please find out who that is?

9/20/24 11:26:00 AM EDT

Mike Powell's wife.

9/20/24 11:26:05 AM EDT

+17176291559

Need to kill that

9/20/24 11:26:08 AM EDT

+17176291559

Call them now

9/20/24 11:26:15 AM EDT

+17176291559

Right now

9/20/24 11:39:11 AM EDT

recording was stopped 30 seconds into this.

9/20/24 11:39:38 AM EDT

+17176291559

Great!

9/20/24 11:41:07 AM EDT

+17176291559

On call

9/20/24 11:41:17 AM EDT

very urgent.

9/20/24 11:42:27 AM EDT

Heard some disturbing news

9/20/24 11:52:11 AM EDT

Has Maya been reaching out to you for a call?

9/20/24 11:55:50 AM EDT

I need one minute only

9/20/24 12:04:42 PM EDT

+17176291559

We've tried a couple times back and forth but have not chatted.

9/20/24 12:04:47 PM EDT

+17176291559

With legal.

9/20/24 12:04:54 PM EDT

+17176291559

I'll break

9/20/24 12:04:59 PM EDT

This is really urgent

9/20/24 12:38:03 PM EDT

are you sending cash connect \$40k today? we need cash desperately.

9/20/24 12:38:20 PM EDT

can you send 200k? we can get some rents out too.

9/20/24 12:38:33 PM EDT

Barto and Bob Horst.

9/20/24 1:05:53 PM EDT

Anything from Maya?

9/20/24 1:27:44 PM EDT

+17176291559

No on maya

9/20/24 1:28:12 PM EDT

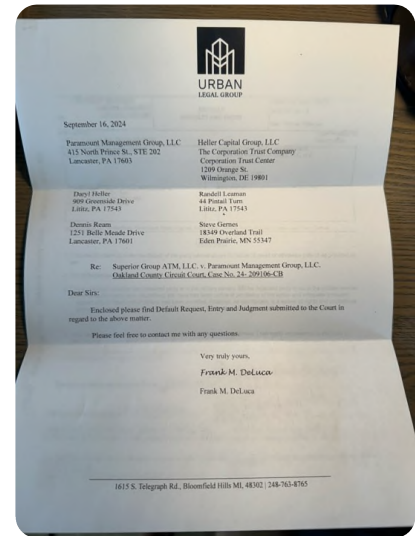
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Pay one month rent to Bob to show good faith. How much is the new Barto rent?

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9/20/24 2:25:22 PM EDT



9/20/24 2:41:53 PM EDT

received in the mail today

9/20/24 4:50:20 PM EDT

Any update on Cypress deal?

9/20/24 4:51:04 PM EDT

+17176291559

Just got a message from Ben the CFO at PAI and looks like it should close Monday

9/20/24 4:51:24 PM EDT

Sweet

9/20/24 11:32:08 PM EDT

I'm inviting you to install Signal! Here is the link:

9/20/24 11:32:10 PM EDT

<https://signal.org/install/>

9/21/24 8:03:40 AM EDT

Do you have a moment to talk in person today?

9/21/24 8:04:02 AM EDT

Important.

9/21/24 8:07:09 AM EDT

How are we doing with Superior ?

9/21/24 9:22:15 AM EDT

Steve received the letter regarding superior and is questioning this very concerned. Period

9/21/24 9:23:02 AM EDT

Should we be hiring independent council? If so, we need to get on this tomorrow.

9/21/24 9:49:48 AM EDT

Dennis is tripping too

9/21/24 9:53:46 AM EDT

+17176291559

I'm talking to Chris today

9/21/24 9:53:55 AM EDT

ok.

9/21/24 9:53:59 AM EDT

+17176291559

We have calls at 10:12 and then all afternoon with Billy and Rory

9/21/24 9:54:09 AM EDT

who is Billy and Rory?

9/21/24 9:54:49 AM EDT

had a follow up on Dennis' conversation that I wanted to download you on



Messages - +17176291559

Certification in Support Page 381 of 810

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9/21/24 10:58:46 AM EDT

Daryl is speaking with Chris today who is the person behind this. Will keep you posted. He said that they had an agreement and believes this is handled but I will let you know.

Dennis Ream Jr.  
DR We just want to know when our names are removed like discussed a month or more ago.

Agreed.

Dennis Ream Jr.  
Resolution comes with payment. We were promised our names would be removed ahead of that.

DR This is nuts

Our only options are to hire independent counsel or to go along with what Daryl is working on here so. We have never given up our rights to either of those options.

But if they don't have something soon, then we have no choice, but to go independent.

Dennis Ream Jr.  
DR Agree but we didn't do independent a while ago because he said Chris would remove us. Lot of time has passed. Are we getting removed or are we not?

DR I'd like to see proof of being removed this week

agreed.

Steve Dennis  
SD If you read the big packet, all three of us are named on the cover page, but in the detail, I am not. Not sure if that's because I'm not an owner or not. Agreed that we need to get this settled once and for all.

Dennis Ream Jr.  
DR Just filed an 18th too. Doesn't seem like "part of the process".

agreed. Daryl said they do this to keep the heat on to sign the agreement that they have in place. Will let you know when I hear more.

Dennis Ream Jr.  
DR If there is an agreement then why isn't he signing? Still doesn't answer why we are individually on this and why we aren't removed yet.

I don't know the answer to that. Hoping to find out more today.

Dennis Ream Jr.  
DR Something needs to happen. Can't keep living like this.

9/21/24 11:07:18 AM EDT

+17176291559

Jus hung up with Tommie and Joe and they are good u to late next week

9/21/24 11:07:26 AM EDT

+17176291559

Penn with out prestige legal team

9/21/24 11:07:30 AM EDT

+17176291559

Now on

9/21/24 11:26:00 AM EDT

Liked "Jus hung up with Tommie and Joe and they are good ..."

9/22/24 12:33:55 PM EDT

+17176291559

Hit Chris again.

9/22/24 12:33:59 PM EDT

+17176291559

Waiting

9/22/24 12:34:04 PM EDT

+17176291559

I'm out this afternoon

9/22/24 12:34:35 PM EDT

OK, thank you if he doesn't respond, I think we need to engage the Michigan attorney tomorrow. We can't risk having a default judgment against us. None of us can afford that type of settlement.

9/22/24 12:37:19 PM EDT

Are you able to take off today and do something other than work?

9/22/24 12:38:41 PM EDT

+17176291559

➔ Replying to you, 2024-09-22 12:34:35: « OK, thank you if he doesn't respond, I think we need to engage the Michigan attorney tomorrow. We ca... »

He stated he is willing settle. I'm all over but agree.

9/22/24 12:38:54 PM EDT

+17176291559

➔ Replying to you, 2024-09-22 12:34:35: « OK, thank you if he doesn't respond, I think we need to engage the Michigan attorney tomorrow. We ca... »

Trying to for a few hours. I'm exhausted.

9/22/24 12:39:28 PM EDT

I believe it. Watch the Eagles. Hopefully they win

9/22/24 12:40:56 PM EDT

By the way the fbi is investigating cypress and prestige. That's what they said to Dennis

9/22/24 12:41:48 PM EDT

Said they had a lot of complaints.

9/22/24 12:42:34 PM EDT

+17176291559

Cypress? Why?

9/22/24 12:42:37 PM EDT

Said they were interviewing a number of people in Lancaster

9/22/24 12:43:02 PM EDT

➔ 2024-09-22 12:42:34: « Cypress? Why? »

I don't know. Dennis didn't get into with him.

9/22/24 12:43:16 PM EDT

+17176291559

Not paramount? Did Dennis talk with them?

9/22/24 12:43:50 PM EDT

+17176291559

Complains are from Haverstick and people he asked to call

9/22/24 12:43:57 PM EDT

No. Said he was employed by Paramount and Dennis said he would connect them with our legal

9/22/24 12:44:08 PM EDT

+17176291559

Complaints

9/22/24 12:44:17 PM EDT

+17176291559

Complain

9/22/24 12:45:01 PM EDT

But it didn't go any further. Agent said he saw lawsuit from Chris and that's how he got Dennis

9/22/24 12:45:37 PM EDT

Cypress was the people we didn't pay. But I'm guessing

9/22/24 12:46:05 PM EDT

One of the people we didn't pay said he was going to the FBI but I don't know who

9/22/24 12:46:26 PM EDT

Hopefully we can pay everyone tomorrow

9/22/24 12:47:24 PM EDT

I am assuming that Jorge and Maya are taking to them based on what Drew said

9/22/24 2:31:47 PM EDT

Happy to have you come over tonight if you just want to gel. Won't talk work - I promise. Can have drinks and cigars

9/22/24 3:00:45 PM EDT

+17176291559

I would love to, but I'm not even at home and currently a couple hours away chilling at my lodge as I had to leave the house given Char now has Covid

9/22/24 3:00:54 PM EDT

Loved "I would love to, but I'm not even at home and curr..."

9/22/24 3:01:04 PM EDT

Sorry to hear about Char. Rest up.

9/23/24 7:30:51 AM EDT

Good morning Daryl. Any word out of Chris?

9/23/24 7:50:35 AM EDT

Also, are we closing on Cypress today?

9/23/24 8:02:54 AM EDT

+17176291559

Chris and I are speaking this morning and I will let you know outcome  
Cypress will be today or tomorrow, likely tomorrow. Dave is being Dave.

9/23/24 8:03:34 AM EDT

Ok. How much are we going to get at close so I can prepare payment release?

9/23/24 8:05:13 AM EDT

+17176291559

Dave is moving again on amounts so let me work with him. It'll be well over 1 million now another million plus in 30 days.

9/23/24 8:05:59 AM EDT

+17176291559

2.5+ total after cypress payments etc

9/23/24 8:06:14 AM EDT

ok. can I use all of that for customer payments?

9/23/24 8:08:26 AM EDT

we already released \$230k of checks last week I believe and have another \$477k ACH for July payments.

9/23/24 8:08:41 AM EDT

we also now have \$945k due for August payments

9/23/24 8:11:59 AM EDT

do you have any other cash you can bring in today?

9/23/24 8:18:38 AM EDT

Also, don't forget about cash connect payment due today.

9/23/24 8:30:02 AM EDT

and DLA payment. sorry

9/23/24 9:03:02 AM EDT

Also, Rabah is tripping because we have not paid him in a year for his monthly expense, plus he has paid rents and other expenses out of his pocket to protect our customers.

9/23/24 9:03:28 AM EDT

email from Rabah

9/23/24 9:03:30 AM EDT

Randall,

As per our call earlier today, here's the info you requested.

I'm replying to a previous email to make it easier for you to track and recall where we're at on July commissions and what I've laid out for July and August commissions.

You'll notice that we've laid out a total of \$116,633.90 as of today between July and August '24 commissions. This number hasn't changed since the last update I provided you,

After taking into account the \$59,542.56 for the Sam's Food July commission that we recently received from PMG, the balance for July 2024 commissions we would need this Monday enabling us to send out all remaining July commission payments and make me whole on what I've laid out for July commissions would be \$164,242.40

As mentioned in my previous email, I have also laid out an additional, \$49,377.41 for August '24 commissions as of today. This number hasn't changed since the last update I provided you,

Total of \$213,619.81, is the amount needed to make all merchants whole for July '24 and me whole on what I've laid out for July and August commissions as of today.

A passed due remaining balance of \$8,713.00 to the service company Kifaru would get it current as well, which would be helpful.

You and I also spoke about you sending some additional funds over to apply towards prior monthly expenses I've continued to cover as well. These have been approximately \$40k+ a month which include Rapid and Brinks amongst other things - this has been a lot and really painful on my side to continue to carry.

An additional payment on Monday for me to apply towards prior expenses, it's much needed and would be appreciated. As you're aware, I have not received expense reimbursements in a VERY long time.

Thanks,  
Mike Rabah

9/23/24 10:31:12 AM EDT

+17176291559

Need to pay jeff. How much came on over weekend? Can we quickly trigger wire now?

9/23/24 11:22:20 AM EDT

Should I set up a call with Michigan counsel this afternoon?

9/23/24 11:31:06 AM EDT

+17176291559

Not yet. We are talking shortly. He's with his mom at the hospital.

9/23/24 11:31:30 AM EDT

+17176291559

Please send email to jeff stating he should see his wire in his account

9/23/24 11:31:59 AM EDT

We have a Thursday deadline for this. Worried that the default judgment will hit Dennis Steve and me.

9/23/24 11:32:04 AM EDT

Liked "Please send email to jeff stating he should see hi..."

9/23/24 11:33:59 AM EDT

I feel like he is playing games with this.

9/23/24 11:34:34 AM EDT

Any update on closing cypress?

9/23/24 11:34:34 AM EDT

+17176291559

He plays games to put on leverage, but has always delivered. I'll let you know shortly.

9/23/24 11:34:46 AM EDT

Liked "He plays games to put on leverage, but has always ..."

9/23/24 11:38:50 AM EDT

Did Jerry drop his lawsuit?

9/23/24 11:42:10 AM EDT

+17176291559

We are very close. It's going to happen. It will happen today.

9/23/24 11:42:15 AM EDT

+17176291559

Just hung up an hour phone call

9/23/24 11:42:28 AM EDT

+17176291559

On Cypress, I'm waiting to hear back from Ben the CFO and then a final call with Dave .

9/23/24 11:43:17 AM EDT

Ok. Thanks. Will this settle the investor issue then and free up capital to come to us?

9/23/24 12:12:18 PM EDT

+17176291559

Do you have more comments to add to Sasha comments. Send me email on what you feel we should accept and not accept. Need to get final back to Charles. We've talked through it a few times and need to send him final back

9/23/24 12:13:43 PM EDT

I have no more comments other than the concerns for the clawback section that I'm sure you have been inside of

9/23/24 12:14:01 PM EDT

+17176291559

Yes.

9/23/24 12:14:09 PM EDT

Otherwise we are good.

9/23/24 12:19:32 PM EDT

can we message Cypress customers yet and let them know they will be paid tomorrow?

9/23/24 12:19:43 PM EDT

we have been silent so far.



9/23/24 1:02:44 PM EDT

+17176291559

I think that has some risk. Let me work through with David Charles and look to other later today?

9/23/24 1:02:57 PM EDT

Liked "I think that has some risk. Let me work through w..."

9/23/24 4:14:41 PM EDT

Daryl we need to get \$40k to Clatworthy now

9/23/24 4:15:24 PM EDT

But we need cash from you today as well.

9/23/24 4:21:24 PM EDT

Also we need superior to drop Steve Dennis and me.

9/23/24 4:32:35 PM EDT

I can't wait on Chris. I'm calling Chicago counsel tomorrow

9/23/24 5:04:51 PM EDT

+17176291559

He's calling me after his daughters event

9/23/24 5:06:15 PM EDT

We are losing customers. If we can't get cash from Dave Charles tomorrow, do you have cash we can send out? We have a \$2 M cash hit that will hit us if we can make our merchant payments. Very soon Clatworthy has already started to hit us. About \$40k so far.

9/23/24 5:06:33 PM EDT

A large customer has locked up our ATMs and will not let armored get to them. There's about \$2 million in those machines if we can't get to the cash then Clatworthy will charge us for it.

9/23/24 5:06:44 PM EDT

It's considered theft.

9/23/24 5:07:26 PM EDT

About \$200k in back rent is due.

9/23/24 8:12:38 PM EDT

+17176291559

Can you quickly respond to the email? I will then call you about Charles. Just need you to approve the step is it has to get filed in the next 20 minutes.

9/23/24 8:13:08 PM EDT

Yes but I didn't get it yet

9/23/24 8:13:35 PM EDT

Just got it.

9/23/24 8:16:39 PM EDT

+17176291559

I can walk you through it as a pride doesn't make sense. This puts us in total control and the trigger events. We have a high probability of pulling off with investors. Worst case we're just back to where we were but in a more controlled environment.

9/23/24 8:18:00 PM EDT

Don't understand the super majority rights granted to Jerry.

9/23/24 8:18:30 PM EDT

Number 12

9/23/24 8:20:11 PM EDT

Other worry is that this is a long process and will delay any other funding which we desperately need.

9/23/24 8:20:48 PM EDT

We can't seem to raise anything while this litigation is in process.

9/23/24 8:58:31 PM EDT

Is True dead until this stip process is complete?

9/23/24 9:00:48 PM EDT

And just to reiterate - Dennis and I must be released from the Superior lawsuit at this point otherwise I want to get separate legal counsel for this matter.

9/23/24 9:18:45 PM EDT

+17176291559

I made the request again

9/23/24 9:18:59 PM EDT

Ok.

9/23/24 9:49:31 PM EDT

When are you back in town? I'd like to get together in person. I'm out on Friday visiting my son in Indianapolis.

9/23/24 11:30:49 PM EDT

Also please send me a copy of the agreement with Superior before you execute. I want to be sure Dennis and I are not personally guaranteeing this debt. Thanks.

9/24/24 6:56:18 AM EDT

May I share the stip with Dennis?

9/24/24 8:19:15 AM EDT

Can we get together today in person? I have a number of questions that I need to ask. Thanks

9/24/24 9:36:19 AM EDT

12. Upon the occurrence of a Triggering Event: (i) Jerry Hostetter shall immediately assume a majority and super majority governing interest in and majority and super majority voting control of Prestige Investment Group, LLC; and (ii) the Joint Praecept Discontinue All Claims and Counterclaims and Mark the Case Closed filed on September 12, 2024 in the Fund Litigation shall be struck off and the Fund Litigation reinstated.

9/24/24 9:36:31 AM EDT

what does this mean? — you are out at Prestige?

9/24/24 9:37:04 AM EDT

if your proposal is rejected?

9/24/24 9:41:14 AM EDT

I know you are closing the Dave Charles thing but we really need to talk.

Messages - +17176291559

Certification in Support Page 392 of 810

+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

9/24/24 9:43:12 AM EDT

plus I need to see agreement for superior asap this morning.

9/24/24 10:31:41 AM EDT

Daryl will you please respond so I know you are seeing these?

9/24/24 11:30:31 AM EDT

Any update on Dave Charles?

9/24/24 12:05:15 PM EDT

hello?

9/24/24 12:14:39 PM EDT

+17176291559

Calling him now

9/24/24 12:14:56 PM EDT

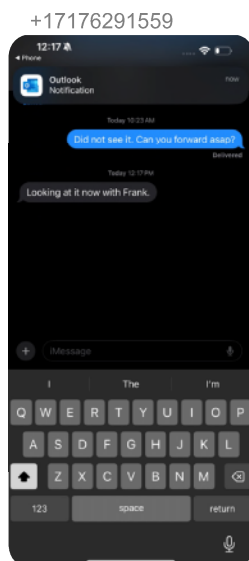
Ok

9/24/24 12:17:43 PM EDT

+17176291559

From Chris

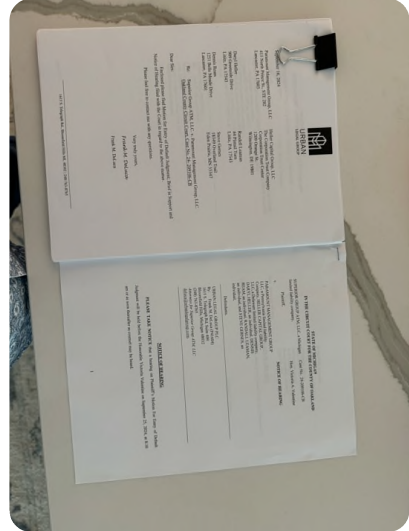
9/24/24 12:17:55 PM EDT



9/24/24 12:18:11 PM EDT

Thanks

9/24/24 1:00:20 PM EDT



9/24/24 1:00:20 PM EDT

Just received in the mail

9/24/24 1:01:01 PM EDT

+17176291559

Thats old

9/24/24 1:01:25 PM EDT

Yes. But hearing is tomorrow

9/24/24 1:07:14 PM EDT

We getting cash today from David Charles?

9/24/24 1:18:07 PM EDT

Daryl, we will need cash regardless from you today to at least pay for all the outstanding checks and another 40 K to John Clatworthy

9/24/24 2:40:05 PM EDT

any update on Dave Charles?

9/24/24 2:42:11 PM EDT

+17176291559

Talked with him. Waiting to hear back.

9/24/24 2:56:05 PM EDT

are we close to a deal?

9/24/24 3:16:24 PM EDT

+17176291559

yes

9/24/24 3:32:01 PM EDT

will you please send cash for Clatworthy now? and I would like to pay Doug Michola \$20k

9/24/24 3:39:49 PM EDT

+17176291559

I'm sending 40 for Clatworthy but I don't have 20 for doug. Will get that tomorrow.

9/24/24 3:39:57 PM EDT

ok

9/24/24 3:40:20 PM EDT

+17176291559

Need Sasha proposed language back

9/24/24 3:40:23 PM EDT

+17176291559

Asap

9/24/24 3:40:32 PM EDT

ok. I will push here.

9/24/24 3:46:47 PM EDT

Steve Gernes has three job offers.

9/24/24 3:46:55 PM EDT

or "opportunities"

9/24/24 3:47:28 PM EDT

unfortunately my back up plan with Dennis leading is not going to work

9/24/24 3:47:37 PM EDT

so I guess I will need to do this.

9/24/24 3:47:58 PM EDT

any other thoughts?

9/24/24 3:56:19 PM EDT

Maybe if Dennis knows the investor thing will be resolved amicably he might think otherwise

9/24/24 4:13:03 PM EDT

see your email inbox for Sasha modifications. Since it is PDF they don't appear as redlines.

9/24/24 4:14:18 PM EDT

+17176291559

Can't you send back as red lines.

9/24/24 4:14:26 PM EDT

+17176291559

Ill forward these in the interim

9/24/24 4:14:32 PM EDT

i will find out.

9/24/24 4:31:57 PM EDT

Daryl redline versions emailed to you

9/24/24 4:32:31 PM EDT

by the way please see the email from our counsel regarding Ray Davis — he is repossessing the assets and there doesn't appear to be any way to stop him.

9/24/24 4:33:13 PM EDT

unless we negotiate with him.

9/24/24 4:33:49 PM EDT

+17176291559

What? How?

9/24/24 4:34:22 PM EDT

Daryl and Randall,

Today we received the attached Notice of Disposition of Collateral regarding Sharenet. The plaintiffs in the Sharenet litigation (Ray Davis, etc.) have sent this notice to announce their intention to sell assets of Sharenet (the "Collateral"). This move is being made outside of the litigation pending in New York state court.

Instead, Davis is asserting a right to institute an "Article 9 sale" pursuant to the parties' agreements and Article 9 of the Uniform Commercial Code. Davis is relying upon the transaction documents, which he assert provides him with a security interest in Sharenet's Collateral (including all of its machines, property, accounts, equipment, inventory, cash, etc.). Under certain circumstances, Article 9 allows a secured creditor to repossess and sell collateral immediately upon a debtor's default under a security agreement. This process does not require that Davis first obtain a judgment in the New York state court litigation. He is moving forward with this process separate and apart from the New York state court litigation.

Davis proposes to repossess and then hold a public sale of the Sharenet collateral in Syracuse at 10am on October 21, 2024.

Please pass the attached document and this information along ASAP to any other legal or business advisors that you are working with who may have a need to know about this proposed repossession and sale of Sharenet's assets and property. We should also set up a call ASAP with you, me, Steve, and potentially other lawyers from our office -- along with any of your other advisors -- to discuss potential responses to this Notice.

Please confirm receipt of this message and please let me know when we can meet to discuss the Notice.

Thank you,

9/24/24 5:00:07 PM EDT

Any response from Dave Charles?



9/24/24 5:17:09 PM EDT

And any update on Superior and our modifications?

9/24/24 5:22:42 PM EDT

Daryl I'm absolutely tripping here on the superior thing. We have no recourse and we are on the hook for \$6m.

9/24/24 5:23:28 PM EDT

This will ruin me

9/24/24 5:25:49 PM EDT

And Dennis too.

9/24/24 5:26:05 PM EDT

+17176291559

Randall the 6 million is bullshit and it's a claim and not real. They can't collect on you. They can name you on a suit and that's it.

9/24/24 5:26:15 PM EDT

+17176291559

Christian just sent back the documents, but it does not include all the changes. They're working with us.

9/24/24 5:26:23 PM EDT

+17176291559

I've just spent an hour with David Charles.

9/24/24 5:26:40 PM EDT

Sasha says I'm on the hook for this.

9/24/24 5:27:49 PM EDT

Liked "Christian just sent back the documents, but it doe..."

9/24/24 5:28:14 PM EDT

➔ 2024-09-24 17:26:23: « I've just spent an hour with David Charles. »

Cool. How did you make out?

9/24/24 5:29:46 PM EDT

➔ 2024-09-24 17:26:15: « Christian just sent back the documents, but it does not include all the changes. They're working with us. »

I absolutely need to be in official not personal capacity and Dennis too

9/24/24 5:30:04 PM EDT

I want to sleep at night.

9/24/24 6:32:38 PM EDT

[https://lancasteronline.com/news/local/parties-in-lancaster-based-atm-network-suit-put-case-on-hold-work-toward-settlement/article\\_b0c01dc0-7ab8-11ef-b460-a7b299679b6d.html](https://lancasteronline.com/news/local/parties-in-lancaster-based-atm-network-suit-put-case-on-hold-work-toward-settlement/article_b0c01dc0-7ab8-11ef-b460-a7b299679b6d.html)

9/24/24 6:32:38 PM EDT

**LNP | LancasterOnline: Parties in Lancaster-based ATM network suit put case on hold, work toward settlement**

Parties in Lancaster-based ATM network suit put case on hold, work toward settlement

9/24/24 6:37:24 PM EDT

+17176291559

Did not read. On cal. Posture or negative?

9/24/24 6:37:39 PM EDT

Negative.

9/24/24 6:38:10 PM EDT

They accused Paramount's owner, Daryl Heller, of fraudulently keeping the money to benefit himself or his Heller Capital Group collection of companies.

9/24/24 6:38:18 PM EDT

+17176291559

wtf! Was not on hold. Dismissed

9/24/24 6:39:04 PM EDT

Heller and his entities still face a number of other lawsuits in Pennsylvania, New York, Florida and Michigan seeking tens of millions of dollars largely related to breach of contract claims as well as a \$5 million tax lien by the federal government.

9/24/24 6:40:29 PM EDT

Dave Charles deal done?

9/24/24 7:28:42 PM EDT

+17176291559

Yes

9/24/24 7:29:05 PM EDT

+17176291559

I'm still working on the Chris issue. He's wanting us to sign this and then re-sign something. They're willing to call the court and cancel tomorrow. I'm trying to get him to move on this issue.

9/24/24 7:29:12 PM EDT

+17176291559

He's also going to bring the liability down to 2.6 million

9/24/24 7:31:31 PM EDT

Regardless of the amount I cannot sign this and Dennis won't either. I dont understand why they won't bend on this. We are not personal guarantors

9/24/24 7:32:07 PM EDT

+17176291559

I'm waiting for him to call me back.

9/24/24 7:32:53 PM EDT

I think this is a wrong expectation from them on this and will turn into a gotcha later.

9/24/24 7:33:30 PM EDT

+17176291559

He's a bully and this is how he operates, but he always concedes one thing at a time.

Then we should quickly get counsel to go to court tomorrow. Telling you he will remove this. Beyond it we're paying it. I'll give you a carve out of Heller Capital Group so you have the security of the 2.9 million.

9/24/24 7:33:42 PM EDT

+17176291559

➔ Replying to you, 2024-09-24 19:32:53: « I think this is a wrong expectation from them on this and will turn into a gotcha later. »

Agreed

9/24/24 7:34:32 PM EDT

I just don't feel comfortable with this. Can he delay the court hearing to give us time on this ?

9/24/24 7:35:19 PM EDT

If he is able to do something later then let's delay and do something now. I guranteee he never gets around to doing something later for us.

9/24/24 7:35:33 PM EDT

I'd rather go to court and fight this.

9/24/24 7:36:47 PM EDT

He must understand that we are not in your position financially and we are already on the hook for Orrstown and credit cards. I won't be able to sleep knowing this is out there

9/24/24 7:37:07 PM EDT

I am struggling to hold it together now.

9/24/24 7:37:35 PM EDT

+17176291559

➔ Replying to you, 2024-09-24 19:34:32: « I just don't feel comfortable with this. Can he delay the court hearing to give us time on this ? »

Asking

9/24/24 7:38:02 PM EDT

+17176291559

➔ Replying to you, 2024-09-24 19:37:07: « I am struggling to hold it together now. »

I will backstop this

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

9/24/24 7:38:10 PM EDT

+17176291559

I'm waiting to hear back from him.

9/24/24 7:38:14 PM EDT

+17176291559

They said they can call the courts in the morning

9/24/24 7:38:45 PM EDT

Understood but you are already backstopping so much that I fear that no one is backstopping you.

9/24/24 7:41:32 PM EDT

It's not right of them to push us into a personal guarantee

9/24/24 7:42:44 PM EDT

And we had the chance to deal with this a month ago but chose to try to work it out with them first.

9/24/24 7:42:54 PM EDT

It's just not right.

9/24/24 7:52:19 PM EDT

Sorry to push you on this but I know what my limits are and this is far beyond them.

9/24/24 7:53:25 PM EDT

Also we are not going to have a company left if we don't get cash and pay our customers. It's really bad

9/24/24 8:01:07 PM EDT

+17176291559

Yes we will

9/24/24 8:01:15 PM EDT

+17176291559

I am doing everything I can randall

9/24/24 8:01:18 PM EDT

+17176291559

Day/night

9/24/24 8:01:22 PM EDT

+17176291559

Chris is calling me back

9/24/24 8:01:22 PM EDT

I know you are.

9/24/24 8:01:31 PM EDT

+17176291559

Dave will close tomorrow

9/24/24 8:01:43 PM EDT

And I'm sorry to dump on you

9/24/24 8:02:19 PM EDT

I am trying to hold it together but the fear is overwhelming

9/24/24 8:02:57 PM EDT

+17176291559

I understand. I'm getting a path beyond this

9/25/24 4:20:58 AM EDT

I must have a face to face with you today.

9/25/24 10:09:20 AM EDT

just making sure you saw this email from Jeff

9/25/24 10:09:22 AM EDT

Daryl and Randall, the Stipulation was filed and the Court will enter it as an Order shortly. Daryl and/or Paramount has until Thursday to agree with the other side on a protocol for the proposal to the investors per the stip and then till Tuesday, Oct. 1, to make the proposal to the investors. Once again, DLA will not participate in that as that is not appropriate. I assume, Daryl, you will work with Stapleton on that but I'm not sure he's even involved anymore since he may not have a client anymore.

It is imperative that you get these actions accomplished though or the stip says the litigation will immediately proceed and the authority issue is off the table - meaning Hostetter has full authority to act on behalf of Prestige.

To be clear, the presentation referenced in the stip is a presentation between Prestige and its investors. If the investors agree, then it's for Paramount to perform the buyout with Prestige. If they don't, or if you falter on any of the milestones, the litigation continues.

To be ready for that event, I highly recommend again that you engage a financial advisor/Chief Restructuring Officer/finance expert to immediately review all Paramount financial information and be ready to report to the Court or pursue alternative strategies. I have a recommendation who could jump in immediately. Please let me know.

If the deal doesn't happen and we are forced to proceed with the litigation and expedited discovery, we will need to be ready and if we get the same responses from Paramount to our requests as before, we will have to withdraw as Paramount's counsel. That is why a financial advisor is so critical. Also, if this deal does not go forward, you've bargained away much of your defense of this case - ie, lack of authority is no longer a defense, you may prove unable to do the buyout, so that defense will likely fail, and Paramount still legitimately owes Prestige tens of millions of dollars under the MSAs. So, unless Paramount has the ability to pay the amounts owed, Paramount may be forced into bankruptcy at that point. That's why a financial advisor is so critical and now.

So, please ensure that you do what's necessary on the Prestige side to comply with the upcoming milestones on investor presentation etc and keep me informed of the process.

Thanks.

9/25/24 10:30:24 AM EDT

+17176291559

Agreed on Eva. Talking to him now.

9/25/24 10:31:18 AM EDT

Liked "Agreed on Eva. Talking to him now. "

9/25/24 10:34:51 AM EDT

Also, want to make sure you have Sharenet Asset sale on your radar as well.

9/25/24 10:43:23 AM EDT

+17176291559

Call Dennis. They need it.

9/25/24 10:45:09 AM EDT

I called. He didn't answer

9/25/24 10:47:39 AM EDT

+17176291559

Default would be bad comparatively

9/25/24 10:48:05 AM EDT

I agree

9/25/24 10:48:31 AM EDT

I also texted him no response

9/25/24 10:58:45 AM EDT

Yesterday he said he was in an area of bad cell coverage.

9/25/24 11:30:48 AM EDT

+17176291559

This is critical. Can you get Dennis. They are going to fuck all of us without his sig

9/25/24 11:31:07 AM EDT

+17176291559

Please advise asap. Ally phone?

9/25/24 11:31:31 AM EDT

Trying again to call him



9/25/24 11:31:53 AM EDT

He doesn't answer

9/25/24 11:32:06 AM EDT

+17176291559

Ally?

9/25/24 11:32:26 AM EDT

He is on a guys golf outing in Washington state.

9/25/24 11:32:37 AM EDT

She is here in Lancaster.

9/25/24 11:33:41 AM EDT

Plus I don't have her number.

9/25/24 11:33:47 AM EDT

+17176291559

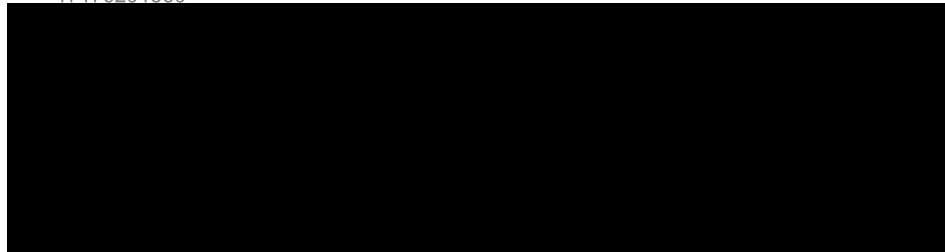
Do we know nick's number?

9/25/24 11:33:59 AM EDT

I don't have that either.

9/25/24 11:34:29 AM EDT

+17176291559



9/25/24 11:36:01 AM EDT

I just tried him again but no response.

9/25/24 11:39:51 AM EDT

I just found alys number and texted her to ask for his resort number.

9/25/24 11:40:09 AM EDT

I remembered I texted her about his urgent care status.

9/25/24 11:41:59 AM EDT

No response from her either

9/25/24 11:45:59 AM EDT

+17176291559

Resign the new duck without Dennis. Do you see it.

9/25/24 11:46:35 AM EDT

Ok. Just got it.

9/25/24 11:47:21 AM EDT

I just signed

9/25/24 11:47:24 AM EDT

+17176291559

Sign

9/25/24 11:47:53 AM EDT

Do we need Dennis signature now?

9/25/24 11:48:37 AM EDT

I tried calling the resort and they couldn't locate him

9/25/24 11:49:29 AM EDT

+17176291559

He can do later

9/25/24 11:49:37 AM EDT

Ok

9/25/24 11:49:53 AM EDT

+17176291559

Got Chris to approve

9/25/24 11:50:00 AM EDT

Ok

9/25/24 11:50:19 AM EDT

+17176291559

They adjourned hearing

9/25/24 11:50:31 AM EDT

So what does that mean?

9/25/24 11:50:43 AM EDT

They are accepting the agreement?

9/25/24 11:50:47 AM EDT

+17176291559

Cancelled

9/25/24 11:50:51 AM EDT

Ok.

9/25/24 11:51:00 AM EDT

+17176291559

Yes no default

9/25/24 11:51:08 AM EDT

Cool.

9/25/24 11:53:55 AM EDT

Taking to Dennis now

9/25/24 11:55:16 AM EDT

+17176291559

H me needs to sign.

9/25/24 11:55:21 AM EDT

+17176291559

He

9/25/24 12:00:03 PM EDT

He said he is on the course and can't sign right now. I said he needs to talk to you. I explained why I signed.

9/25/24 12:06:47 PM EDT

+17176291559

Well it docusign and he can on phone but okay.

Have Sasha do indemnify action on pg of me and heller capital to you and Dennis

9/25/24 12:07:43 PM EDT

I will get this from her.

9/25/24 12:07:58 PM EDT

+17176291559

Tell Dennis

9/25/24 12:08:01 PM EDT

I doubt he will sign.

9/25/24 12:11:16 PM EDT

He saw the text message early in the morning

9/25/24 12:11:23 PM EDT

+17176291559

Well then we are all screwed

9/25/24 12:11:47 PM EDT

+17176291559

Have Sasha developed the indemnification and pg and guarantor

9/25/24 12:11:55 PM EDT

He did let say that but I wonder.

9/25/24 12:12:03 PM EDT

Didn't say that.

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

9/25/24 12:34:07 PM EDT

anything out of Dave Charles?

9/25/24 1:01:40 PM EDT

+17176291559

Reached out to him. If not today, I'm highly confident of tomorrow

9/25/24 1:08:08 PM EDT

+17176291559

If you wanna send an email out to the affiliates that will receive payment this week you can do that

9/25/24 1:08:21 PM EDT

Ok.

9/25/24 1:10:01 PM EDT

I'm going to have this come from you as it did the last time.

9/25/24 1:10:08 PM EDT

rose will send out

9/25/24 1:47:13 PM EDT

+17176291559

Send me a screenshot of the email

9/25/24 1:47:54 PM EDT

Ok hasn't been created yet

9/25/24 1:49:28 PM EDT

Just in case, please see the draft below:

Subject: Update on Payment Status

Dear [Affiliate's Name],

We hope this message finds you well.

We want to keep you informed and sincerely apologize for the delay in getting the payments out to you. However, we are happy to share that payments will be sent this week [specific day if possible]. We greatly appreciate your continued support and patience during this time.

Thank you for your understanding, and please don't hesitate to reach out if you have any further questions.

Best regards,  
Daryl Heller

9/25/24 1:50:58 PM EDT

You good with this?

9/25/24 1:51:01 PM EDT

+17176291559

Just put by end of the week

9/25/24 1:51:11 PM EDT

+17176291559

You're only putting it to the 10 or 12 people we still owe money, correct?

9/25/24 1:51:25 PM EDT

Correct

9/25/24 1:52:09 PM EDT

+17176291559

Need two things, what is the exact amount owed because David Charles needs it for each individual per month?

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmcp.com, +17179172753

9/25/24 1:52:23 PM EDT

+17176291559

And, please confirm that everyone that put us on notice is still within the cure period

9/25/24 1:52:31 PM EDT

Ok

9/25/24 1:52:40 PM EDT

+17176291559

Send me the four people the emails they sent to put us on notice the exact date we received it and when the cure ends

9/25/24 1:53:34 PM EDT

Liked "Send me the four people the emails they sent to pu..."

9/25/24 1:54:21 PM EDT

Cypress Payments Outstanding			
	August	July	Total
Cypress Advantage -0823	\$ 20,551	\$ 28,726	\$ 49,277
Digital Music Systems	\$ 127,796	\$ 124,340	\$ 252,136
Pride Vending NW	\$ 272,730	\$ 324,902	\$ 597,632
Progressive ATM / WATM	\$ 188,525	\$ 67,085	\$ 255,610
			\$ 1,154,656
Angus Arcades LLC		\$ 31,392	
Beyer & Brown Inc		\$ 53,258	
BTM Vending		\$ 130,773	
Cash Money ATMs, LLCs		\$ 46,458	
Gator Coin II, Inc		\$ 23,443	
Hawkeye Gaming		\$ 69,501	
Mobile Cash Solutions		\$ 120,460	
N2 Amusements		\$ 57,802	
Progressive ATM / WATM		\$ 67,085	
Quality Data Systems		\$ 29,253	
WATM		\$ 141,298	
West Coast Amusements		\$ 29,394	
			\$ 800,116
Totals	\$ 609,603	\$ 1,345,169	\$ 1,954,772

9/25/24 1:57:12 PM EDT

you ok with the messaging otherwise?

9/25/24 2:01:09 PM EDT

Dear [Affiliate's Name],  
We hope this message finds you well.  
We want to keep you informed and sincerely apologize for the delay in getting the payments out to you. However, we are happy to share that payments will be sent this week. We greatly appreciate your continued support and patience during this time.  
Thank you for your understanding, and please don't hesitate to reach out if you have any further questions.  
Best regards,  
Daryl Heller

9/25/24 2:01:17 PM EDT

this is what I have now. ok to send?

9/25/24 2:07:05 PM EDT



Paramount.%20Summary%20of%20Notices%20of%20Default%  
209.25.24.docx

9/25/24 2:07:39 PM EDT

looks like the only past 30 days is Tri Valley Amusements

9/25/24 2:14:25 PM EDT

Tri Valley is not related to the delay in rent payment but they are asking for interchange payment that wasn't made months ago. I'm looking into the status of this and will report when I know

9/25/24 2:19:44 PM EDT

➔ Replying to you, 2024-09-25 14:01:09: « Dear [Affiliate's Name],  
We hope this message finds you well.  
We want to keep you informed and sincere... »

ok to send?

9/25/24 2:32:57 PM EDT

actually see the note on Mobile Cash Solutions — they might consider September 10 as the cure period. so we might lose that one



Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

9/25/24 3:14:56 PM EDT

here is final

9/25/24 3:15:01 PM EDT

Last Update: September 25, 2024

Paramount  
Summary of Notices of Default

No.	Name of the Party(ies) Giving Notice of Default	Date of the Letter	Due Date to Provide a Response under the Notice Before Legal Action is Initiated	Notes
1.	Digital Music Services, Inc. and Progressive ATM, Inc.	08/28/2024	No due date expressly mentioned.	Cure Period of 30 days is acknowledged per the corresponding agreement.
2.	Pride Vending NW LLC.	09/12/2024	No due date expressly mentioned.	
3.	Mobile Cash Solutions, LLC.	09/11/2024	No due date expressly mentioned.	The letter mentions that there was an email communication dated August 11, 2024, which served as the Default Notice and the Default Notice Date. Letter also refers September 10, 2024 as the date considered as the date the 30 days cure period ended. We cannot find the email. We believe the letter is the actual notification.
4.	TriValley Amusement LLC	09/21/ 2024	No due date expressly mentioned.	Cure Period of 30 days is acknowledged per the corresponding agreement.  This is not related to July August rent and they are disputing an arrangement that has been in place since 2017. We are not accepting this notice and responding accordingly.

9/25/24 3:17:37 PM EDT

Cypress Payments Outstanding			
	August	July	Total
Cypress Advantage -0823	\$ 20,551	\$ 28,726	\$ 49,277
Digital Music Systems	\$ 127,796	\$ 124,340	\$ 252,136
Pride Vending NW	\$ 272,730	\$ 324,902	\$ 597,632
Progressive ATM / WATM	\$ 188,525	\$ 67,085	\$ 255,610
			\$ 1,154,656
Angus Arcades LLC		\$ 31,392	
Beyer & Brown Inc		\$ 53,258	
BTM Vending		\$ 130,773	
Cash Money ATMs, LLCs		\$ 46,458	
Gator Coin II, Inc		\$ 23,443	
Hawkeye Gaming		\$ 69,501	
Mobile Cash Solutions		\$ 120,460	
N2 Amusements		\$ 57,802	
Progressive ATM / WATM		\$ 67,085	
Quality Data Systems		\$ 29,253	
WATM		\$ 141,298	
West Coast Amusements		\$ 29,394	
			\$ 800,116
Totals	\$ 609,603	\$ 1,345,169	\$ 1,954,772

9/25/24 3:17:48 PM EDT

these two are what you requested.

9/25/24 3:18:14 PM EDT

just need to know if you are ok with the messaging

9/25/24 3:18:38 PM EDT

+17176291559

Yes it n message

9/25/24 3:50:38 PM EDT

your indemnity to Dennis and me in your inbox.

9/25/24 4:05:25 PM EDT

Will you please reach out to Clatworthy?

9/25/24 4:06:08 PM EDT

Or send us cash?

9/25/24 4:08:52 PM EDT

Prefer the latter.

9/25/24 10:34:08 PM EDT

+17176291559

Need Dennis to sign or we are cooked

9/25/24 10:35:07 PM EDT

I don't know what to do on this. I can send another text.

9/25/24 10:35:30 PM EDT

+17176291559

Copy me

9/26/24 8:22:15 AM EDT

will you please respond to Joe. he's blowing me up on my phone.

9/26/24 8:22:40 AM EDT

are we getting cash today from Dave Charles? If so, how much?

9/26/24 10:35:25 AM EDT

Questioned "are we getting cash today from Dave Charles? If so..."

9/26/24 11:05:01 AM EDT (Edited 9/26/24 11:05:25 AM EDT)

Also, we owe \$72,500 to superior which was due yesterday. We got to get that out today.

Edited

9/26/24 11:07:42 AM EDT

+17176291559

It wasn't due yesterday because Dennis did not sign

9/26/24 11:07:53 AM EDT

+17176291559

Charles is saying he's going to settle today

9/26/24 11:08:06 AM EDT

OK, cool how much cash we gonna get?

9/26/24 11:09:21 AM EDT

+17176291559

2.1m plus 2m for merchants. 4.1m. Please do not allocate anything internally until we talk and strategize on how to best utilize this. Are we 100% confident of the amount that we owe to merchants 1.954m?

9/26/24 11:10:18 AM EDT

Which merchants are you referring to? Cypress. Or other?

9/26/24 11:11:17 AM EDT

+17176291559

Cypress

9/26/24 11:11:32 AM EDT

Yes, I'm sure that number

9/26/24 1:14:49 PM EDT

The cypress merchant payment is \$67k too high. Steve will get the correction to you

9/26/24 1:15:47 PM EDT

+17176291559

Can you quickly call me?

9/26/24 1:48:51 PM EDT

Daryl, please check your inbox for the list of assumed contracts. We just pulled it from what we had on our asset purchase agreement.

9/26/24 8:26:19 PM EDT

Good evening. Did Dave sign?

9/26/24 8:26:28 PM EDT

+17176291559

Yes!

9/26/24 8:26:41 PM EDT

+17176291559

And wired. Should see you in the morning.

9/26/24 8:26:45 PM EDT

Woo hoo! Good job ! Thanks.

9/26/24 8:26:50 PM EDT

+17176291559

please keep this confidential for now

9/26/24 8:26:54 PM EDT

Nice. How much are we going to get.

9/26/24 8:27:03 PM EDT

Ok.

9/26/24 8:27:18 PM EDT

+17176291559

I saw we just got another termination letter. I just sent him a message that he should talk to me before he wires any other affiliates tomorrow. I think we should use payment of July and August recover that. Is the one that sent in the termination big

9/26/24 8:27:19 PM EDT

We're gonna have to think about messaging because when Dave wants to start taking over the word will get out immediately

9/26/24 8:27:44 PM EDT

+17176291559

part of the agreement is Dave will not tell anyone for three weeks. That's what I brokered with him.

9/26/24 8:27:45 PM EDT

I didn't see that.

9/26/24 8:27:53 PM EDT

Ok. Cool

9/26/24 8:28:29 PM EDT

Are we going to continue to operate and pretend like nothing has changed at this point?

9/26/24 8:29:33 PM EDT

+17176291559

No, not necessarily. Let's put our game plan together Monday.

9/26/24 8:30:43 PM EDT

OK, I'm just saying that the moment we start to make any changes, people will know and the word will get out

9/26/24 8:31:12 PM EDT

OK. How much cash are we gonna get tomorrow because I want to get merchant payments out ASAP

9/26/24 8:31:21 PM EDT

Plus, I'd like to get some partner payments out maybe not all of them.

9/26/24 8:31:33 PM EDT

+17176291559

Should be a little over 2.1 million

9/26/24 8:31:50 PM EDT

Awesome!

9/26/24 8:31:53 PM EDT

+17176291559

I need to get back the superior ATM payments and a few others. Let's strategize on the cash.

9/26/24 8:32:36 PM EDT

Ok. I need to make decisions first thing tomorrow morning so I can direct the team.

9/27/24 7:53:21 AM EDT

Payments		
Customer Payments	\$	1,600,000
July Partner Payments	\$	144,000
August Patner Payments	\$	195,000
Urgent Trade A/P	\$	161,000
total	\$	2,100,000

9/27/24 7:53:32 AM EDT

here is how I'd use the cash in order of priority

9/27/24 7:53:42 AM EDT

I realize you have other issues to address.

9/27/24 7:53:55 AM EDT

can I give direction to team to get current on customer payments?

9/27/24 7:54:05 AM EDT

I need to get them started on this now.

9/27/24 8:03:11 AM EDT

also we have DLA Piper of \$41k unless you already paid that

9/27/24 8:06:45 AM EDT

also cash connect.

9/27/24 8:07:58 AM EDT

+17176291559

How is DLA Piper 41k again? Seems impossible. Send me invoice.

9/27/24 8:08:30 AM EDT



EML\_8055754-1 (002).pdf

9/27/24 8:08:31 AM EDT

+17176291559

Let's get merchants caught up for two months ago and then prioritize the August. We got to make this cash spread around.

9/27/24 8:09:16 AM EDT

when do we get our next payment from Dave Charles and how much?

9/27/24 8:09:33 AM EDT

can I pay July partner payments?

9/27/24 8:14:55 AM EDT

also, who is paying the Cypress merchant payments that are past due?

9/27/24 8:16:03 AM EDT

I guess we need to get Tommy and Joe payments out too

9/27/24 8:32:10 AM EDT

also, did you make any payments to Samantha Guthrie that did NOT come through Paramount? Need to give details to their legal counsel for the hearing

9/27/24 8:35:33 AM EDT

+17176291559

I'm traveling here quick answers

9/27/24 8:35:40 AM EDT

+17176291559

➔ Replying to you, 2024-09-27 08:09:33: « can I pay July partner payments? »

Yes

9/27/24 8:35:51 AM EDT

+17176291559

➔ Replying to you, 2024-09-27 08:16:03: « I guess we need to get Tommy and Joe payments out too »

Yes - 68k

9/27/24 8:36:08 AM EDT

+17176291559

➔ Replying to you, 2024-09-27 08:32:10: « also, did you make any payments to Samantha Guthrie that did NOT come through Paramount? Need to give ... »

75k I believe

9/27/24 8:36:40 AM EDT

➔ Replying to you, 2024-09-27 08:14:55: « also, who is paying the Cypress merchant payments that are past due? »

were these taken care of at settlement/

9/27/24 8:36:49 AM EDT

➔ Replying to you, 2024-09-27 08:14:55: « also, who is paying the Cypress merchant payments that are past due? »

or is there something else I need to do?

9/27/24 8:37:51 AM EDT

also, please remember our call at 9 am with legal counsel regarding Sharent in 20 minutes



Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

9/27/24 8:44:02 AM EDT

+17176291559

➔ Replying to you, 2024-09-27 08:14:55: « also, who is paying the Cypress merchant payments that are past due? »

I told him to hold given notice yesterday. Can you please tell me how much that notice represents?

9/27/24 8:44:33 AM EDT

+17176291559

➔ Replying to you, 2024-09-27 08:14:55: « also, who is paying the Cypress merchant payments that are past due? »

I don't think we should pay that individual until they resign. do you have two minutes to call me?

9/27/24 8:45:10 AM EDT

prefer to have Steve Gernes call you. he says he needs to help in this process or it won't go out correctly. Can I have him call you?

9/27/24 8:46:50 AM EDT

+17176291559

This is about the notices not payments

9/27/24 8:49:28 AM EDT

Last Update: September 25, 2024

Paramount  
Summary of Notices of Default

No.	Name of the Party(ies) Giving Notice of Default	Date of the Letter	Due Date to Provide a Response under the Notice Before Legal Action is Initiated	Notes
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2.	Pride Vending NW LLC.	09/12/2024	No due date expressly mentioned.	
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4.	TriValley Amusement LLC	09/21/ 2024	No due date expressly mentioned.	Cure Period of 30 days is acknowledged per the corresponding agreement.  This is not related to July August rent and they are disputing an arrangement that has been in place since 2017. We are not accepting this notice and responding accordingly.

9/27/24 9:01:36 AM EDT

on the Sharenet call

9/27/24 9:37:07 AM EDT

Daryl we need cash for the ACH for customers to go out. We can't send until we have

9/27/24 9:38:47 AM EDT

+17176291559

Can I send this to the JBT account or does it need to be FNB??

9/27/24 9:38:57 AM EDT

+17176291559

I think we should push it over and Tonya so FNB doesn't sweep

9/27/24 9:39:05 AM EDT

+17176291559

I can wire multiple times today.

9/27/24 9:39:11 AM EDT

+17176291559

How should first be?

9/27/24 9:39:19 AM EDT

let me find out from team

9/27/24 10:01:25 AM EDT

please see email I just sent you for Cypress customers and notices of default.

9/27/24 10:11:38 AM EDT

+17176291559

Did not get it. Can you resend?

9/27/24 10:12:07 AM EDT

yep. just resent

9/27/24 10:21:50 AM EDT

Also keep in mind that whoever coordinates pay payments to Cyprus from Dave Charles side should connect with Steve Gernes so we can make sure this gets done properly

9/27/24 10:27:09 AM EDT

+17176291559

Urgent question - are any of those five you sent me with that FIS. If so, it doesn't matter.

9/27/24 10:27:14 AM EDT

+17176291559

Need to know that before I quickly sent to Dave .

9/27/24 10:27:50 AM EDT

No, none of these are on FIS. These are all on CDS

9/27/24 10:29:23 AM EDT

+17176291559

CDS is making the payment so does Steve just speak to them again?

9/27/24 10:29:48 AM EDT

yes. i believe so. I will have him do that.

9/27/24 10:59:47 AM EDT

+17176291559

We can do it, but it's killing all this cash. I'm desperately trying to preserve for us. I've also underwritten hundreds of thousands personally for us. Trying to deal with FNB and orrstown for us.

I will send if you want. I also have a great fear of that size wire going in with FNB hawking our account.

9/27/24 11:00:08 AM EDT

+17176291559

Lmk and consider it done

9/27/24 11:01:33 AM EDT

understood..

9/27/24 11:01:54 AM EDT

+17176291559

Are you sure you don't wanna pay all the hot ones for August and keep a couple hundred k for those that are not asking or talking?

9/27/24 11:02:54 AM EDT

The issue we have is we don't know al of the hot issues because many are just not saying anything. plus this lets the competitors know we are current.

9/27/24 11:03:12 AM EDT

+17176291559

When is next payment due?

9/27/24 11:03:18 AM EDT

I will break this into July and August as separate actions.

9/27/24 11:03:22 AM EDT

we are past due.

9/27/24 11:03:35 AM EDT

+17176291559

Oct what?

9/27/24 11:04:14 AM EDT

multiple dates for customer payments. if i remember correctly payments go out on the 10th, 15th, 20th and 25th but that is very old information.

9/27/24 11:04:25 AM EDT

for the previous month activity

9/27/24 11:06:33 AM EDT

+17176291559

makes me very nervous, sending all this but I can. we could also focus on making sure the New York business is paid for August and hold some of the other until next week when we know what other funding we have coming

9/27/24 11:07:20 AM EDT

let me find out how much is ACH and how much is checks. Checks won't hit until late next week. Do you feel more comfortable with that ?

9/27/24 11:08:41 AM EDT

+17176291559

I just think we need to keep a reserve. I think you should focus on on the top part of August and pay those and keep 4-500k

9/27/24 11:09:58 AM EDT

what is current cash balance?

9/27/24 11:11:30 AM EDT

+17176291559

It depends how much I pull back of everything that was paid. Definitely need the 75K back from superior for yesterday. Paid over 600K bridge debt payment in the last couple weeks. We do not need it all back. or trying to conserve some for Paramount until we have better optics next week

9/27/24 11:11:52 AM EDT

got it.

9/27/24 11:12:51 AM EDT

assuming True is not going to occur?

9/27/24 11:13:29 AM EDT

+17176291559

I hope it is Randall. Just trying not to get back into a desperate position.

9/27/24 11:13:51 AM EDT

yes agreed. the only desperation I feel right now is with customer payments.

9/27/24 11:14:00 AM EDT

we can defer on everything else.

9/27/24 11:14:56 AM EDT

+17176291559

Why not pay top customers for August today? And all of New York City.

9/27/24 11:15:02 AM EDT

+17176291559

I need to get a wire out, please tell me

9/27/24 11:38:42 AM EDT

when is the next holdback payment from Dave Charles and how much?

9/27/24 11:46:42 AM EDT

From John Scheck regarding Cash Depot

9/27/24 11:46:44 AM EDT

Hi Randall- not sure if you saw the last email from the cash depot team. They asked for our contact people for CDS and PAI. I will need to get our current contacts likely from onboarding team or Tracy but before I did I wanted to ensure we were comfortable sharing that info with them?

9/27/24 11:47:16 AM EDT (Edited 9/27/24 11:47:28 AM EDT)

happy to provide this but it will be nearly impossible to keep this a secret

Edited

9/27/24 11:48:14 AM EDT

also, please docusign indemnity agreement — should be in your inbox.

9/27/24 11:50:28 AM EDT

+17176291559

➔ Replying to you, 2024-09-27 11:48:14: « also, please docusign indemnity agreement — should be in your inbox. »

Signed

9/27/24 11:50:49 AM EDT

thanks

9/27/24 11:51:37 AM EDT

+17176291559

➔ Replying to you, 2024-09-27 11:38:42: « when is the next holdback payment from Dave Charles and how much? »

Randall we took money iodine so holdback is only 200k. We could taken 1.4m and got 2.6 total in 60 days

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

9/27/24 11:52:50 AM EDT

I thought 3.2M was upfront cash with a \$200k reduction for no holdback?

9/27/24 11:53:26 AM EDT

so we were due \$3.4 some upfront and some later but to take all up front we reduced to \$3.2

9/27/24 11:53:39 AM EDT

+17176291559

It was 1.8m with no cash on what was in agreement

9/27/24 11:53:45 AM EDT

+17176291559

Sorry on call and driving

9/27/24 11:56:55 AM EDT

ok. somehow I missed this. I thought we were selling the entire book for \$7M — \$1.7 earlier + 3.4 +2 for Cypress payments

9/27/24 11:57:34 AM EDT

+17176291559

I'll explain

9/27/24 11:57:41 AM EDT

ok.

9/27/24 11:58:54 AM EDT

+17176291559

The fact that the business is running out right and the PA I put us in a position of leverage (getting zero) totally changed the circumstance. We still got high sixes for it.

9/27/24 11:59:20 AM EDT

understood.

9/27/24 12:00:51 PM EDT

→ Replying to you, 2024-09-27 11:46:44: « Hi Randall- not sure if you saw the last email from the cash depot team. They asked for our contact pe... »

how do you want to handle this?

9/27/24 12:02:40 PM EDT

the issue here is that the moment any one else hears about this, the entire industry will know.

9/27/24 12:02:58 PM EDT

not worried about Cash Depot but everyone else.

9/27/24 12:45:32 PM EDT

What do you think about Rabah's request?

9/30/24 8:56:01 AM EDT

Good morning Daryl. Just landed at Philadelphia. Any direction on cash today? Can we pay August Merchant and partner payments?

9/30/24 11:56:21 AM EDT

+17176291559

FNB clouded 900 K from Heller Capital Group accounts this morning. Applying it towards line of credits they say hello capital is cross guarantor. I'm in the process of getting it back. We just need to hold everything until this comes back because they took all of our cash!

9/30/24 11:57:06 AM EDT

Shit

9/30/24 11:57:22 AM EDT

Sorry to hear about your house robbery.

9/30/24 11:57:22 AM EDT

+17176291559

Fuck!

9/30/24 12:01:37 PM EDT

I believe we are going to have some margin remaining from Cypress business. Did you work out how that is getting back to us?



9/30/24 12:49:36 PM EDT

+17176291559

Do we have payroll this week?

9/30/24 12:51:03 PM EDT

yes.

9/30/24 12:54:20 PM EDT

Dennis is quitting

9/30/24 12:54:46 PM EDT

asking for a mutual separation.

9/30/24 12:54:55 PM EDT

Superior is big factor in his mind.

9/30/24 12:55:59 PM EDT

wants severance for run out.

9/30/24 12:56:10 PM EDT

+17176291559

I wanted to reach out and let him know. I wanted to meet with him but failed to over the weekend

9/30/24 12:56:19 PM EDT

+17176291559

Just ask if he will get together with us on Wednesday to talk through it.

9/30/24 12:56:53 PM EDT

he is believing he has a mental health issue. Feels like he is in the middle of a nightmare

9/30/24 12:57:54 PM EDT

Steve is also out the door too.

9/30/24 12:58:15 PM EDT

I'm afraid we will lose people in finance

9/30/24 12:58:42 PM EDT

What time Wednesday?

9/30/24 12:58:59 PM EDT

we have a one hour noon scheduled. is that what you were thinking?

9/30/24 1:01:43 PM EDT

My son Evan came over last week and told me and said Lancaster Reddit posts are terrible. He feels bad about being employed by Paramount and others do as well

9/30/24 1:01:58 PM EDT

The name association is what he feels badly about

9/30/24 1:12:19 PM EDT

+17176291559

The Reddit stuff apparently has people planted by Haverstick to post things. We've got so much information has come through to us. The sink should quiet down with the removal and putting on hold of our lawsuits and hopefully the successful vote next Monday. Randall, it's a total nightmare for man. I'm very sorry. My children is not to read any of that as it's a smear campaign, but I understand how difficult it is.

9/30/24 1:13:09 PM EDT

I told them the same thing. I'm not worried about Evan — I'm worried about losing the finance team and anyone with knowledge

9/30/24 1:14:24 PM EDT

if the vote is successful do you have cash to pay everyone by November 20?

9/30/24 1:19:03 PM EDT

we need beach house mortgage payment cash and about \$3k for house maintenance and the last cleaning bill so \$25k tomorrow.

9/30/24 1:27:49 PM EDT

can you and I get together tonight or tomorrow night to talk in advance of Dennis meeting? I have a number of questions that need answers.

9/30/24 1:34:52 PM EDT

From Clatworthy

9/30/24 1:34:53 PM EDT

Heard Daryl is regrettably wrapped up in a robbery at his home over weekend. Are you able to share what can be wired today and tomorrow. ~\$496 K is the June balance that we need to get satisfied asap. Thanks

9/30/24 3:27:53 PM EDT

Anything from FNB?

9/30/24 5:19:33 PM EDT

Emphasized "we need beach house mortgage payment cash and abou..."

9/30/24 5:35:21 PM EDT

➔ Replying to you, 2024-09-30 13:19:03: « we need beach house mortgage payment cash and about \$3k for house maintenance and the last cleaning bi... »

Bringing this to the top

9/30/24 5:38:15 PM EDT

➔ Replying to you, 2024-09-30 13:14:24: « if the vote is successful do you have cash to pay everyone by November 20? »

And this is the granddaddy of all worries for me.

10/1/24 7:29:41 AM EDT

+17176291559

Randall, I have a presentation at 4 PM today. That is the most important of my life. Given the break in yesterday and work with detectives I am way behind.

10/1/24 7:29:48 AM EDT

+17176291559

I will prioritize everything with you tomorrow

10/1/24 7:29:56 AM EDT

+17176291559

Maybe we can push Dennis meeting to a bit later in the day?

10/1/24 7:30:59 AM EDT

Ok. I'm available whenever. Good luck tonight. Interested in hearing how it went

10/1/24 7:39:43 AM EDT

It's the most important of my life too. So I'm pulling for you

10/1/24 2:34:49 PM EDT

[https://lancasteronline.com/business/local\\_business/investors-in-lancaster-based-atm-network-await-buyout-offer-after-months-of-missed-payments/article\\_4db3b574-7f69-11ef-a7eb-e703bbb277f3.html](https://lancasteronline.com/business/local_business/investors-in-lancaster-based-atm-network-await-buyout-offer-after-months-of-missed-payments/article_4db3b574-7f69-11ef-a7eb-e703bbb277f3.html)

10/1/24 2:34:49 PM EDT

**LNP | LancasterOnline: Investors in Lancaster-based ATM network await buyout offer after months of missed payments**

Investors in Lancaster-based ATM network await buyout offer after months of missed payments

10/1/24 3:11:41 PM EDT

+17176291559

From Charles, you could call him

10/1/24 3:11:48 PM EDT

+17176291559

Daryl payments will not be made if I do not get a list of who you paid directly and how much by noon central today CDS is holding us up

10/1/24 3:11:54 PM EDT

working on it already

10/1/24 3:12:12 PM EDT

I've already talked to him

10/1/24 5:03:45 PM EDT

Finished with the call?

10/2/24 8:13:14 AM EDT

Good morning Daryl, hope you had a restful night. Just checking to see what your thoughts are on getting together today trying to plan out my calendar.

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

10/2/24 9:39:31 AM EDT

please respond so at least I know you are ok.

10/2/24 11:24:44 AM EDT

Buyouts of ATM investors outlined ahead of vote on proposal  
CHAD UMBLE | Staff Writer  
Published Wed Oct 02, 2024 5:30 AM EDT

Investors in a Lancaster-based ATM network will soon be mulling buyout proposals of their investments which haven't been paying out since April. Daryl Heller, owner of the ATM network, presented the broad outlines of a proposed buyout for the fund's roughly 2,700 investors during a webinar Tuesday. Heller said investors would get specific proposals Thursday but outlined several scenarios that showed investors receiving all of their money back.

"No one will end up with anything less than what their initial investment was," said Heller, who wore a dark suit jacket and opened collared white dress shirt during the roughly 40-minute presentation he gave by himself. The buyout proposal offers a 30% payment for the missed quarterly payment from the second quarter of this year and then lump-sum payouts based on how long ago someone invested. Investors who were near the end of their seven-year term and had been receiving monthly payments will get less of a lump sum payment in a buyout.

Tuesday's presentation was part of a court-approved schedule that would settle a lawsuit brought on behalf of investors. The next step will be a vote by investors to approve or disapprove of the buyout proposal. Approval of the proposal is necessary to trigger buyout payments.

An investment makes someone a member of one of the 25 limited liability companies that comprise the investment fund's Prestige Investment Group, and each fund will take separate votes, with the outcome determined by a simple majority.

Voting begins Thursday and will end Monday, with Heller saying results will be published Wednesday, Oct. 9.

"We're looking for an up-or-down vote of all 25 funds and not looking for some funds to accept and some not to accept, even though that could be a reality here," Heller said.

If the proposals are accepted, a 40% payment would be made by Oct. 21 with the balance paid by Nov. 21.

"I do look forward to this vote," Heller said. "I'm hopeful that you will see this as being a good outcome, and we're essentially solving for what we feel is best in the context of where we are relative to current realities."

Before introducing the buyout proposal to investors watching the webinar, Heller offered some clues about the financial problems that led to the missed payments. He said some underfunded acquisitions and "holdbacks challenges" contributed to a cash crunch. Heller also said cost of necessary upgrades to the ATMs as well as the impact of high interest rates and the loss of some key accounts were other factors. Heller did not address where they money was coming from for buyouts but said he has links to the entities that could wind up owning all the ATMs in the network that he says includes some 25,000 cash machines. "I don't own any of the affiliates directly, but I have entities that have equity in them and our debt and equity partners. I would likely still have some interest in it, but that interest in it would have zero economic compensatory (benefit) on a daily, monthly annual basis to me."

10/2/24 11:26:27 AM EDT

[https://lancasteronline.com/business/local\\_business/buyouts-of-atm-investors-outlined-ahead-of-vote-on-proposal/article\\_d71f9de4-805b-11ef-bf4b-c703f53d1280.html](https://lancasteronline.com/business/local_business/buyouts-of-atm-investors-outlined-ahead-of-vote-on-proposal/article_d71f9de4-805b-11ef-bf4b-c703f53d1280.html)

10/2/24 11:35:47 AM EDT

Just so you know, 1st ISO is reaching out to our people about contracts for Cypress so the word is out about the sale

10/2/24 11:43:08 AM EDT

we need to announce this internally.

10/2/24 11:55:24 AM EDT

Need \$25k at DHRL for mortgage and maintenance work that was done in June

10/2/24 11:55:46 AM EDT

Mortgage was due yesterday

10/2/24 12:04:22 PM EDT

+17176291559

I moved personal Kent and laid it

10/2/24 12:04:29 PM EDT

+17176291559

Money and paid it

10/2/24 12:04:58 PM EDT

Thanks

10/2/24 12:59:47 PM EDT

will you please send me executed definitive docs for Cypress so we now how to book?

10/2/24 2:51:04 PM EDT



BL\_883248541\_446108.000001.pdf

10/2/24 3:54:30 PM EDT

I'm here at your house.

10/2/24 3:56:15 PM EDT

In your front driveway.

10/2/24 4:00:15 PM EDT

+17176291559

Charlene wants us to go to tequilas

10/2/24 4:00:21 PM EDT

+17176291559

Coming out now

10/2/24 4:00:24 PM EDT

+17176291559

Meet u there

10/2/24 4:00:24 PM EDT

Ok

10/2/24 4:00:27 PM EDT

Yep

10/3/24 8:21:23 AM EDT

realize this is the least issue on your mind — but regarding the beach house conversation — we are happy to continue as is and I can find other places to invest cash. I proposed this to make it easier on you for raising capital.

10/3/24 8:21:34 AM EDT

also, when can you talk today about Sharenet?

10/3/24 8:55:07 AM EDT

please send Cypress closing docs

10/3/24 6:46:14 PM EDT

Hey Daryl, hope everything's OK. Dennis mention that you have additional activity related to the break-in.



10/3/24 6:47:42 PM EDT

+17176291559

Yes

10/3/24 6:48:03 PM EDT

+17176291559

I'll explain. Fucking insanity

10/3/24 6:48:17 PM EDT

+17176291559

Liked "realize this is the least issue on your mind — but..."

10/3/24 6:48:18 PM EDT

So sorry

10/3/24 6:49:51 PM EDT

You're welcome to stay at my house tonight if you like we're not there

10/3/24 6:50:21 PM EDT

+17176291559

Ty

10/3/24 6:50:27 PM EDT

+17176291559

It's really fucked up.

10/3/24 6:50:47 PM EDT

+17176291559

Three Hispanic dudes. Playing games w me

10/3/24 6:51:10 PM EDT

Jeez. Related to this whole investor thing?

10/3/24 6:51:58 PM EDT

You're also welcome to join us here at the beach house

10/3/24 6:52:45 PM EDT

+17176291559

➔ Replying to you, 2024-10-03 18:51:10: « Jeez. Related to this whole investor thing? »

Don't know. Hope not. We thinks something else

10/3/24 6:54:03 PM EDT

Did they catch them?

10/3/24 6:55:51 PM EDT

There's a bunch of Hispanic dudes working around the golf course and all that

10/3/24 6:57:35 PM EDT

+17176291559

Not yet

10/4/24 7:57:07 AM EDT

When can we talk today about Sharenet?

10/4/24 9:37:15 AM EDT

our controller Liz just resigned.

10/4/24 9:40:35 AM EDT

can you send \$10k to DHRL for my personal reimbursements (\$5k to me and \$4k to handyman for maintenance work)

10/4/24 9:40:47 AM EDT

7605 Pleasure Ave										
Transaction Report										
January - August, 2024										
	Date	Transaction Type	Num	Adj	Name	Memo/Description	Account	Split	Amount	Balance
Due to/Due From RL	Beginning Balance									160.00
	02/05/2024	Journal Entry	51	No		Expenses paid by Randall	Due to/Due From RL	-Split-	826.89	966.89
	03/31/2024	Journal Entry	58	No		Expenses paid by Randall	Due to/Due From RL	-Split-	97.13	1,062.82
	04/30/2024	Journal Entry	59	No		Expenses paid by Randall	Due to/Due From RL	-Split-	231.04	1,313.86
	05/31/2024	Journal Entry	60	No		Expenses paid by Randall	Due to/Due From RL	-Split-	627.93	1,941.79
	06/30/2024	Journal Entry	61	No		Expenses paid by Randall	Due to/Due From RL	-Split-	506.89	2,448.68
	07/31/2024	Journal Entry	62	No		Expenses paid by Randall	Due to/Due From RL	-Split-	613.31	3,061.99
	08/31/2024	Journal Entry	63	No		Expenses paid by Randall	Due to/Due From RL	-Split-	2,019.54	5,081.53
	Total for Due to/Due From RL								\$	4,921.53
TOTAL									\$	4,921.53

10/5/24 7:45:52 AM EDT

Good morning Daryl. Everything ok? Your lack of response yesterday has me concerned

10/5/24 7:57:00 AM EDT

+17176291559

Randall, just completely under the water. The wire did not hit by 4 PM so I will need to wire Paramount Monday morning.

10/5/24 7:57:09 AM EDT

+17176291559

➔ Replying to you, 2024-10-04 09:40:35: « can you send \$10k to DHRL for my personal reimbursements (\$5k to me and \$4k to handyman for maintenanc... »

Yes

10/5/24 7:57:27 AM EDT

+17176291559

I'm in the middle of responding to hundreds of voting emails and it is my top priority so my head is down

10/5/24 7:58:12 AM EDT

Ok. Thanks. Just wanted to be sure you are ok. Any early indications on which direction people are leaning?

10/5/24 7:58:36 AM EDT

+17176291559

It looks very very positive

10/5/24 7:59:06 AM EDT

Great.

10/7/24 8:40:52 AM EDT

good morning Daryl — tax returns are due in a week. Dennis informed me that our CPAs said if we don't pay on time there will be an IRS tax lein filed which will be public.

10/7/24 10:41:11 AM EDT

email from Mardy Fedder at Way

10/7/24 10:41:13 AM EDT

----- Forwarded message -----  
From: Mardy Fedder <mardy.fedder@waydelivery.com (mailto:mardy.fedder@waydelivery.com)>  
Date: Mon, Oct 7, 2024 at 8:20 AM  
Subject: RE: Summation of Paramount-Way discussion on 09/04/2024  
To: Daryl Heller <dheller@hellercg.com (mailto:dheller@hellercg.com)>, Dennis Ream <dream@margonetwork.com (mailto:dream@margonetwork.com)>  
CC: Shawn Barto <shawn.barto@waydelivery.com (mailto:shawn.barto@waydelivery.com)>, Mardy Fedder <mardy.fedder@waydelivery.com (mailto:mardy.fedder@waydelivery.com)>

On Monday, 10/7, I spoke to Owen and asked him to leave the building because there is no lease agreement and the holdover hasn't been paid. I didn't want to handle in this manner, but Paramount is not working with us. Our next step is a formal eviction. The Board has voted to evict Paramount unless there are lease prepayments, and as of today, silence is a large problem.

Thanks.

Mardy Fedder  
Chief Operating Officer

10/7/24 10:43:19 AM EDT

we also need to decide on Sharenet asset sale

10/7/24 10:55:03 AM EDT

Realize you are swamped — but here are the critical priorities for Paramount:

10/7/24 10:55:18 AM EDT

1	2023 Tax Returns		
2	Sharenet Asset Sale		
3	Way warehouse access		
4	More cash		
5	Company valuations for Orrstown Net worth calcs		
6	Traditions Bank Lawsuit		

10/7/24 11:26:32 AM EDT

When will you know the results of the voting?

10/7/24 1:54:04 PM EDT

➔ Replying to you, 2024-10-04 09:40:35: « can you send \$10k to DHRL for my personal reimbursements (\$5k to me and \$4k to handyman for maintenanc... »

bringing this to the top of your list.

10/7/24 1:55:07 PM EDT

+17176291559

➔ Replying to you, 2024-10-04 09:40:35: « can you send \$10k to DHRL for my personal reimbursements (\$5k to me and \$4k to handyman for maintenanc... »

I'll personally get something in

10/7/24 1:55:15 PM EDT

thanks

10/7/24 1:56:53 PM EDT

+17176291559

So you want them to wire to your account? Can you send that in?

10/7/24 1:57:05 PM EDT

no. just wire to DHRL

10/7/24 1:57:20 PM EDT

I will have Austin pay the maintenance people and send payment to me.  
Thanks

10/7/24 1:58:03 PM EDT

did you figure out Way issue? employees have been locked out.

10/7/24 3:07:23 PM EDT

thanks for taking care of Way.

10/7/24 3:07:47 PM EDT

when do you find out results of voting? I'm sitting on pins and needles



Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

10/7/24 3:25:09 PM EDT

+17176291559

They passed, but we opened it up until 1145. But we're 100% in the clear!!

10/7/24 3:25:22 PM EDT

hallelujah!

10/7/24 3:25:29 PM EDT

wow!

10/7/24 3:25:35 PM EDT

I could cry

10/7/24 3:25:50 PM EDT

what percentage of the vote did we get?

10/7/24 3:26:46 PM EDT

meaning what percent voted for it?

10/7/24 3:28:32 PM EDT

then the next massive hurdle is the funding.

10/7/24 3:29:11 PM EDT

+17176291559

I'll send you all the results. Just tied up right now.

10/7/24 3:29:22 PM EDT

cool. thanks.

10/7/24 3:29:36 PM EDT

are we going to secure funding/

10/7/24 3:30:05 PM EDT

?

10/7/24 3:32:02 PM EDT

congratulations on the first step!

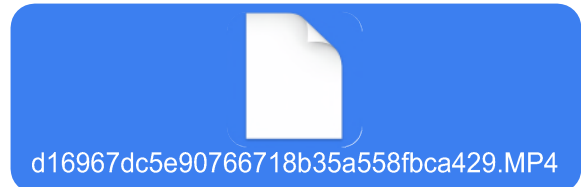
10/7/24 4:01:15 PM EDT

are you pushing first round of funding to October 31?

10/7/24 6:05:48 PM EDT

Liked "I'll send you all the results. Just tied up right ..."

10/7/24 6:21:02 PM EDT



Not sent

10/7/24 6:21:02 PM EDT

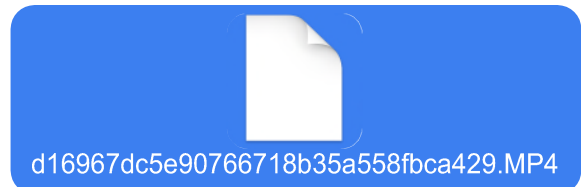
Just remembered a few months back I had somebody snooping at the back of my house. My video cameras caught it. This guy lives in the neighborhood.

Not sent

10/7/24 6:26:06 PM EDT

Thought it might be helpful for you if you saw the same guy on your cameras

10/7/24 6:34:33 PM EDT



Not sent

10/7/24 7:05:02 PM EDT



10/7/24 7:05:02 PM EDT

[View recent photos](#)

10/7/24 7:05:28 PM EDT

Just remembered a few months back I had somebody snooping at the back of my house. My video cameras caught it. This guy lives in the neighborhood.

10/7/24 7:18:46 PM EDT

+17176291559

WTH! Who is it?

10/7/24 7:19:03 PM EDT

+17176291559

Out guys had hoods on. It could be

10/7/24 7:19:07 PM EDT

+17176291559

But

10/7/24 7:19:27 PM EDT

Lives in bent creek in the villas. I know where he lives.

10/7/24 7:19:40 PM EDT

+17176291559

Why was he there?

10/7/24 7:19:41 PM EDT

I reported to the police and sent them the video.

10/7/24 7:19:46 PM EDT

No idea.

10/7/24 7:20:13 PM EDT

He just looked in the garage then left.

10/7/24 8:16:04 PM EDT

Can you send the voting results?



10/8/24 8:47:30 AM EDT

will you please send voting results?

10/8/24 8:48:17 AM EDT

good morning by the way 😊

10/8/24 8:51:55 AM EDT

Also reminder that tax returns are due next week. Brandon is saying that they are still waiting for direction from you on Bill of Sales

10/8/24 9:00:45 AM EDT

from John Gurchiek (Knowtone)

10/8/24 9:00:46 AM EDT

Randall:

I know this is a random email and may be a long shot, but I was curious if PMG would have any interest in selling the remaining Know Tone portfolio back to me? Unfortunately, I have seen the news, and my hope is that everything is "ok" -- but just in case PMG wanted to trim some less profitable portfolios, I thought I would at least inquire. Please don't take offense to this email -- it is merely an inquiry in case it is something of interest to PMG.

Thank you!

--

John A. Gurchiek, Esq.  
Attorney

10/8/24 9:00:59 AM EDT

any interest here?

10/8/24 10:16:35 AM EDT

from Dave Charles email

10/8/24 10:16:36 AM EDT

Sorry, I meant the Las Vegas show. I don't recall seeing any numbers showing we were paying the 5%. We paid all of the back owed money. The 5% was supposed to come from you guys. You made the promise. I will try and reach out to Daryl after Wednesday when he's done with his project, I do not believe this belong to us. If I were you, I would fund it and will deal with it later. You don't wanna lose any customers because promises you made my recommendation get them paid immediately.

10/8/24 10:16:46 AM EDT

what are we doing here? we don't have the cash for this.

10/8/24 10:16:53 AM EDT

\$62k

10/8/24 10:17:24 AM EDT

+17176291559

That's exact opposite of what we said last week. He agreed the 5% was in the numbers.

10/8/24 10:17:38 AM EDT

I think he is playing games here.

10/8/24 10:17:46 AM EDT

+17176291559

Yees he is

10/8/24 10:18:02 AM EDT

what should we do here?

10/8/24 11:17:36 AM EDT

+17176291559

I will talk to him

10/8/24 11:17:50 AM EDT

+17176291559

Do not pay it. Let the merchants know it was part of our settlement with CDS and the monies been allocated so it needs to be sent to them.

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

10/8/24 11:55:09 AM EDT

Ok.

10/8/24 11:55:23 AM EDT

Everything still ok with the vote?

10/8/24 11:55:50 AM EDT

Didn't see a response with results and worried that something happened at the last minute.

10/8/24 12:02:44 PM EDT

+17176291559

No, we are clean

10/8/24 12:03:05 PM EDT

Cool.

10/8/24 12:03:37 PM EDT

What percentage voted in favor?

10/8/24 1:25:30 PM EDT

from Clatworthy

10/8/24 1:25:31 PM EDT

We need to average \$35 k per day this week or the hole is getting deeper which we have committed can't happen. And we need to get June satisfied asap as we are approaching 90 days past due.

10/8/24 1:27:06 PM EDT

I have asked Daryl to come meet with us on Tuesday Oct 15 at 10:30 am to talk thru the receivables payment plan and your overall workout plan. Ideally (in my mind) you both would attend as well.

10/9/24 7:57:44 AM EDT

+17176291559

Randall, I am not sitting on cash. I'm trying to get some pulled in. I'm hopeful, we can start to significantly reduce the square payment next week. I also paid off Dash.

10/9/24 7:59:08 AM EDT

OK, understood. What are we doing about our tax returns?

10/9/24 8:12:26 AM EDT

Daryl?

10/9/24 8:54:47 AM EDT

Tax returns?

10/9/24 8:55:13 AM EDT

Liked "Randall, I am not sitting on cash. I'm trying to g..."

10/9/24 8:55:58 AM EDT

+17176291559

Push to the top of my inbox

10/9/24 8:56:03 AM EDT

+17176291559

I'm on calls right now

10/9/24 8:57:54 AM EDT (Edited 10/9/24 8:58:01 AM EDT)

sorry — we need you to give direction on bill of sales. We cannot complete the tax returns until you do

Edited

10/9/24 9:00:02 AM EDT

this is at a standstill

10/9/24 9:53:32 AM EDT

sorry to be a pain in the ass here, but really need your direction on this tax issue regarding bill of sales.

10/9/24 10:03:40 AM EDT

also, is first round of investor payments moved to end of October?

10/9/24 10:16:14 AM EDT

➔ Replying to you, 2024-10-09 09:53:32: « sorry to be a pain in the ass here, but really need your direction on this tax issue regarding bill of... »

if you don't give us bill of sales, we will complete the tax returns as is. They need to be finished today or tomorrow at the latest.

10/9/24 10:17:51 AM EDT

+17176291559

Is there email?

10/9/24 10:17:59 AM EDT

+17176291559

Asking questions?

10/9/24 10:17:59 AM EDT

no

10/9/24 10:18:20 AM EDT

just waiting for you to give direction on investor bill of sales is any

10/9/24 10:18:25 AM EDT

if any

10/9/24 10:18:37 AM EDT

+17176291559

There is bill of sale. If not, there would be 100000,000 losses.

10/9/24 10:19:01 AM EDT

+17176291559

All the monies that came in from January 1, 2023 through December 31, 2023 need to show on a bill of sale.

10/9/24 10:19:28 AM EDT

+17176291559

In the case of first regents and power quest, we need to show them at zero profit and push management fees over to them to push the profit into Paramount as we only have to pay c corp taxes

10/9/24 10:19:41 AM EDT

I've not been involved in this before. I will bring Dennis into convo

10/9/24 10:30:35 AM EDT

➔ Replying to you, 2024-10-09 10:03:40: « also, is first round of investor payments moved to end of October? »

anything on this?

10/9/24 11:15:26 AM EDT

[https://lancasteronline.com/business/local\\_business/investors-in-lancaster-based-atm-network-approve-buyout-offers-after-months-of-missed-payments/article\\_1f72d388-864a-11ef-8114-3bec65097c7a.html](https://lancasteronline.com/business/local_business/investors-in-lancaster-based-atm-network-approve-buyout-offers-after-months-of-missed-payments/article_1f72d388-864a-11ef-8114-3bec65097c7a.html)

10/9/24 2:27:34 PM EDT

Daryl, I'm on pins and needles about the funding for this. I will not bug you at all on this. But will you please do me a favor and text me when you know you've got it all locked up?

10/9/24 3:09:58 PM EDT

Daryl and Randall,

On our call on September 27th, we discussed that Davis, as a secured creditor, could also seek to recover any incoming accounts receivable owed to Sharenet by its customers. This potential remedy is in addition to the proposed Article 9 sale of Sharenet assets that we discussed on that call.

Today, we received the attached email notifying us that Davis intends to contact Sharenet's customers and instruct them to submit all further payments to Davis instead of to Sharenet.

Like the Article 9 sale, this effort by Davis to enforce rights as a secured creditor of Sharenet is wholly separate from the pending New York state court litigation between Davis and Sharenet.

I understood that the two of you were planning to meet to discuss potential routes forward. Please let us know if you have decided on any such course of action.

10/9/24 3:20:51 PM EDT

+17176291559

This offer 1.7 million. 700 K on November 1, and 1000,000 on January 31.

10/9/24 3:21:08 PM EDT

Liked "This offer 1.7 million. 700 K on November 1, and 1..."

10/9/24 3:44:18 PM EDT

+17176291559

Please do not get on call with jeff. Let me handle him

10/9/24 3:45:59 PM EDT

Yes. No intention of getting on with him

10/10/24 8:34:45 AM EDT

Please respond to our text thread on taxes. We need your help.

10/10/24 4:42:59 PM EDT

**From Steve Gernes**

Randall, an investor is repeatedly calling into Customer Support. He is demanding atm lists and serial numbers. We have relayed that he needs to contact Daryl. Vonda is going to have his number blocked.

Mark Mun  
9257086744

10/10/24 4:54:08 PM EDT

Muhn is his last name

10/10/24 4:58:51 PM EDT

+17176291559

He's one of the 15 ones

10/10/24 4:59:27 PM EDT

Not sure I understand

10/10/24 4:59:55 PM EDT

+17176291559

The 15 angry ones. I'll manage him.

10/10/24 5:00:08 PM EDT

Ok.

10/10/24 5:23:21 PM EDT

Needing about 700 K just to get August merchant payments out the door  
Septembers are now due as well

10/10/24 5:24:39 PM EDT

+17176291559

I don't understand what is happening but no way we are generating 500k  
of positive cash. Please have them run report again

10/10/24 5:25:00 PM EDT

We are pulling out 30 K a day for square +150,000 a week for FNB

10/10/24 5:25:27 PM EDT

Agree that now we are not generating \$500k per month.

10/10/24 5:25:52 PM EDT

So 900k per month is still going put

10/10/24 5:25:54 PM EDT

Out

10/10/24 5:26:56 PM EDT

Actually \$1.2m

10/10/24 5:27:03 PM EDT

Just in these two alone.

10/10/24 5:33:14 PM EDT

So hate to keep beating the same drum but we are needing this  
desperately

10/10/24 5:37:16 PM EDT

Plus, we really haven't put much of a dent in our aging payables either  
they just keep growing



Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmcp.com, +17179172753

10/10/24 5:40:42 PM EDT

Aged AP 10.10.24.xlsx

Done

NT GROUP		Total Overdue	Current	1-30	31-60	61-90	90+	Grand Total
		5,094,640.9	1,717,030.98	778,099.43	539,474.71	564,537.94	3,212,528.82	6,811,671.88

		Aging Group	Current	1-30	31-60	61-90	90+	Grand Total
PMG				4,005				4,005
PMG			5,511.44	5,556.44				11,067.88
PMG				0	119			119
PMG							1,475	1,475
SN					1,950			1,950
PMG					925	1,900	3,825	6,650
PMG							1,983.8	1,983.8
FR				2,540.15		-987.75		1,552.4
FR			1					1
PMG					-420.41	0		-420.41
SN				224.53	224.53	224.53	447.52	1,121.11
PMG					437.5			437.5
Total				1,700				1,700

10/10/24 5:40:42 PM EDT

Screenshot 2024-10-10 at 5.40.33 PM

10/10/24 6:25:17 PM EDT

I think the Dennis resignation is gonna blow a big hole in the finance department. Do we have any additional resource at Heller Capital that could help if need be?

10/10/24 6:27:20 PM EDT

We already have Liz, our controller resigning because of all the events in the paper and distrust and indicated to Dennis that others are looking as well

10/10/24 6:33:43 PM EDT

Everyone is reading the postings on Reddit and in the paper and she actually asked Dennis if you're a bad human being

10/10/24 6:34:19 PM EDT

+17176291559

More articles in paper?

10/10/24 6:34:42 PM EDT

No. The ones already posted

10/10/24 6:35:49 PM EDT

I think the Lancaster people feel it more than anybody else. I'm not worried about operations. Just finance. We can afford to lose a few in fact we probably need to so in some cases I'm OK if people leave, but I don't wanna lose too much leadership worst case scenario my back up plan is to promote Evan to the leader of the department and have him get everything accomplished and held together with my help as well.

10/10/24 6:36:13 PM EDT

I may be overreacting, because I generally do, but I don't know

10/10/24 6:37:18 PM EDT

+17176291559

Liked "I think the Lancaster people feel it more than any..."

10/10/24 6:37:21 PM EDT

+17176291559

Do it!

10/10/24 6:37:43 PM EDT

That's my back up plan if Sheck and Brandon bail. If either of them stay, that's my first choice.

10/10/24 6:40:10 PM EDT

I would like to ask you to come in to the finance department when we announce Dennis's departure. Because I want the team to hear from you. I think it would be good for them to see you in person and talk to you and have you give some assurances. I assume we will be announcing this next week so I realize the timing is atrocious.

10/10/24 6:41:13 PM EDT

That said, funding is your number one priority. I will figure this out. Do not want you to get distracted from that.

10/10/24 6:47:37 PM EDT

By the way, I think we're gonna need to rebrand Heller Capital too

10/10/24 6:49:45 PM EDT

+17176291559

➔ Replying to you, 2024-10-10 18:47:37: « By the way, I think we're gonna need to rebrand Heller Capital too »

Been in works for two years before this saga

10/10/24 6:49:58 PM EDT

+17176291559

Liked "I would like to ask you to come in to the finance ..."

10/10/24 6:50:08 PM EDT

+17176291559

I thought Dennis was just gonna play this off as a consultant. Did that change since last week?

10/10/24 6:51:05 PM EDT

No. He's resigning and leaving and he doesn't wanna be associated with anything anymore. In fact he's pushing me to go direct to Brandon a lot of the stuff if you noticed, he's not weighed in on anything on these text messages.

10/10/24 6:51:18 PM EDT

He's happy to provide support to me, but he's making a very clear that I'm dealing with these things

10/10/24 6:52:01 PM EDT

The consultant thing was initially, but when he had the conversation with you and I at the restaurant, he was resigning

10/10/24 6:52:31 PM EDT

That's why we are creating a separation agreement, which is us giving him severance

10/10/24 6:53:07 PM EDT

I even tried an interim concept of a sabbatical, thinking if you he still wanted to be around us, but was just stressed out that he could take a break and come back, but I think he's done with us

10/10/24 6:53:38 PM EDT

If we're up to him, he would've been out a week ago

10/10/24 6:54:12 PM EDT

Now he said he would still support me, which means I could go to him and ask him questions like I've been doing about the bill of sale and things like that, but he had me address you about the bill of sales even though he's the one who's been dealing with it all these years

10/10/24 6:55:07 PM EDT

+17176291559

I understood he's resigning however he told us last week that he already told him he's consulting and he's just gonna play that out casually

10/10/24 6:55:26 PM EDT

Well, I don't think that's the case now

10/10/24 6:55:35 PM EDT

+17176291559

He's probably upset with my response to the text. I'm totally supporting him and will provide him what he needs. It's just his ask on equity is a little unrealistic leaving us high and dry. In the same I do understand why.

10/10/24 6:55:40 PM EDT

Because in a lot of the stuff, he actually told me I don't want to be involved in these things

10/10/24 6:55:57 PM EDT

Yeah, I don't know Daryl. I think it's bigger than that.

10/10/24 6:56:20 PM EDT

I agree that I don't think he should get nine months of compensation get a stock buyout plan and basically leave us high and dry, which is what I think he's doing

10/10/24 6:57:13 PM EDT

I agree on the ask on equity. My feeling is he gets to participate if and when Paramount is sold. And at whatever that valuation is at that time.

10/10/24 6:57:29 PM EDT

He is the one who is choosing to leave. We did not ask him to leave.

net, +17179175670, randall.leaman@paramountmgrp.com, +17179172753

I agree that this is unusual circumstances. And is very very difficult to handle so I feel sympathy for him as well.

I noticed he changed his tune when the FBI thing and the superior thing went down

In Boston at dinner meeting.

Sorry.

Good morning Daryl what am I telling customers and vendors about the timing of payments? Thinking TNT and rabah etc.

## Meaning when are we expecting another round of funding at PMG?

Accounts Payable as of 2/28/2024										
Trade/SG&A										
	Company	Contract	Q 1-23	Q 2-23	Q 3-23	Q 4-23	Q 1-24	Q 2-24	Q 3-24	Q 4-24
WFMG LLC	PMG		30,894	27,227	27,227	57,323	291,498	3	415,122	
WFLX Website Inc.	PMG		37,048	28,008	58,920	58,920	147,820	247,820	137,120	
WFLX News 13	PMG		5,258	48,815	45,744	45,744	134,918	134,918	134,918	
Free Choice Logistics, LLC	PMG				27,848	84	78,284	158,280	158,280	
WFLX	PMG			30,894	27,227	27,227	57,323	291,498	3	
WFLX News 13	PMG		23,213	23,208	23,208	23,208	23,208	23,208	23,208	
ADM Commercial Processors LLC	PMG		17,243	17,279	17,279	18,615	17,279	17,279	17,279	
WFLX	PMG		15,071	39,679	39,682	1,585	39,621	39,621	39,621	
McCombs and Shires LLP	PMG			7,348						
Landolina Inc.	PMG		19,124	12,045	12,045	33,847	33,847	33,847	33,847	
Empire Insurance	PMG						32,840	32,840	32,840	
Investment Management Department of Investment	PMG						38,714	38,714	38,714	
Met Products America & AOM Services, Inc.	PMG		28,736	27,133						
WFLX	PMG						16,240	16,240	16,240	
WFLX	PMG		800	8,438	8,438		23,344	23,344	23,344	
WFLX	PMG		19,889		27,051		17,400	17,400	17,400	
WFLX	PMG			12,763	12,763	4,332				
Land On Top LLC	PMG						38,760	38,760	38,760	
WFLX	PMG		8,051	112,041	7,048	8,130	10,240	27,140	27,140	
Paycom Software	PMG						26,260	26,260	26,260	
Paycom Software	PMG						26,260	26,260	26,260	
North Shore Consultants	PMG					11,200				
WFLX	PMG			66	2,640	10,706	6,770	13,706	13,706	
Sky and Street Asset Locator Inc.	PMG		2,843	2,843	2,843	2,843	6,880	19,280	19,280	
WFLX	PMG		3,362	6,510	6,510	1,000	5,480	4,480	15,230	
WFLX	PMG			1,114	1,114	184	34,720	16,420	16,420	
North Capital and PDC Services	PMG						7,530	7,530	12,230	
WFLX	PMG		1,100	1,100	1,100	1,100	1,100	1,100	1,100	
WFLX	PMG			1,100	1,100		4,540	15,340	15,340	
WFLX	PMG				2,000	5,760	6,410	12,081	12,081	
WFLX	PMG			100	100		1,100	1,100	1,100	
USA DIVERSIFIED SERVICES, INC.	PMG						1,061,244	1,061,244	1,061,244	
Section Security Inc.	PMG		114,900	410,510	468,018					
							\$ 2,134,060		231-Aging	
Sector Capital/Related Party										
Avak Technology Solutions	PMG		7,300	14,061	14,061	31,357	291,154	313,000	313,000	
Avak Capital Group	PMG			25,490	13,540	13,540	37,280	173,120	173,120	
Avak Capital Group	PMG		10,264	10,264	10,264	35,430	78,920	78,920	78,920	
Avak Capital Group	PMG		1,000	1,000	1,000					

thought this might be helpful to understand our aging ap

10/11/24 10:01:30 AM EDT

just reminder that Superior is due Monday and banks are closed.

10/11/24 10:32:28 AM EDT

\$72,500 is due on or before the 14th and banks are closed on the 14th so due today

10/11/24 10:38:17 AM EDT

+17176291559

If the banks are closed, we are good doing it on Tuesday

10/11/24 10:38:29 AM EDT

Ok

10/11/24 2:03:47 PM EDT

**Ray Davis response**

First, we note that a recent press article indicates that other investors are being paid off completely. Ray will not assume an inferior position, particularly in light of his unique rights to an Article 9 sale and his ability to defray and collect payments from your processors.

In light of the foregoing, Ray would be willing to settle upon the following terms:

- a payment of \$200,000 by October 17, 2024, whereupon we would be willing to postpone the Article 9 sale from October 21 to November 18, 2024
- a payment of \$1 million by November 15, whereupon we would be willing to postpone the Article 9 sale to January 2, 2025
- a final payment of \$900,000 by December 31, 2024

Please understand that in light of Ray's rights to pursue an Article 9 sale and to also collect from your processors, this counteroffer is not intended to be the starting point for additional lengthy negotiations. If we cannot come to an agreement in short order, Ray will fully exercise his rights, all of which are expressly reserved.

Please advise as to your client's response.

10/11/24 2:07:03 PM EDT

**Devin's response**

Here's the response from Davis's counsel to your settlement offer. They certainly feel like they have significant leverage given the remedies available to them under Article 9 to attempt to sell equipment and collect receivables due to Sharenet.

We can push back on the Article 9 sale by telling them that we will challenge it in court, after the fact, as not "commercially reasonable" for a variety of reasons. On the collection of receivables, the leverage is all in their favor.

Please let us know how you would like to respond on the monetary terms.

-Devin

10/14/24 9:27:12 AM EDT

Good morning Daryl — I hope you were able to get some rest over the past weekend. You are probably aware of the following already but just wanted to make it easy for you to quickly see what is happening here for our cash picture for the week.

10/14/24 9:27:29 AM EDT

Cash Hits -- Oct 14 - 18	Amount	Due
August Customer Payments	\$ 700,000	10/14/24
September Merchant Payments	\$ 1,000,000	10/14/24
Misc. Urgent Payables	\$ 205,000	10/14/24
FNB	\$ 150,000	10/14/24
Square	\$ 60,000	10/15/24
Tax Payments		10/15/24
Superior	\$ 72,500	10/15/24
Clatworthy	\$ 120,000	10/15/24
Square	\$ 30,000	10/15/24
Square	\$ 30,000	10/15/24
Square	\$ 30,000	10/16/24
First Premier (cash provider)	\$ 117,700	10/16/24
Payroll	\$ 300,000	10/17/24
Ray Davis Settlement	\$ 200,000	10/17/24
Square	\$ 30,000	10/17/24
Square	\$ 30,000	10/18/24
Superior	\$ 2,990,000	10/18/24
	\$ 6,065,200	
Cash Balance Net of Outstanding checks	\$ 230,000	10/14/24
Surcharge Revenue	\$ 477,000	
Net Cash Needed	\$ 5,356,200	
Cash Hit Summary of Above		
Operating	\$ 2,442,700	
Non Operating	\$ 3,622,500	
	\$ 6,065,200	

10/14/24 11:07:23 AM EDT

Daryl — here's what I know from Paramount perspective on overall cash needs for your thinking.

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

10/14/24 11:07:30 AM EDT

Cash Out	Investors/Loan Holders/Non Operating
\$ 2,990,000	Superior
\$ 1,000,000	Square
\$ 1,372,158	Orrstown
\$ 1,834,663	FNB LOC
\$ 7,100,000	Randall Leaman Stock
\$ 2,100,000	Ray Davis
\$ 4,150,000	Samantha
\$ 977,862	Kamy (Just ATMs USA) Holdback
\$ 5,000,000	Restore Paramount Ops Liquidity
\$ 653,349	Rabah Projects -- Capex
\$ 27,178,032	Total

10/14/24 11:08:16 AM EDT

I'm guessing at Square and also, we may not need to payback Orrstown now.

10/14/24 11:44:16 AM EDT

we have two major customers who are ready to walk and demanding payment for August and September. Total is about \$50k in rent payments. We don't have cash to pay.

10/14/24 12:55:31 PM EDT

Daryl, please respond so I know you are ok.

10/14/24 2:38:25 PM EDT

Daryl?

10/14/24 2:53:59 PM EDT

+17176291559

Not ignoring you. I'm dealing with that illness that seems to prop up every two month for me. I'll be totally OK as it usually comes and goes in 24 hours. Been on phone calls and had to lay down a couple times.

10/14/24 2:54:28 PM EDT

ok. thanks for responding. just wanted to make sure you are ok.

10/14/24 2:55:00 PM EDT

how is it going with funding? are we going to be ok?



10/14/24 2:56:15 PM EDT

I need to meet with exec team and Senior Leadership team tomorrow and this is forefront on everyone's minds

10/14/24 3:40:13 PM EDT

➔ Replying to you, 2024-10-14 14:55:00: « how is it going with funding? are we going to be ok? »

Not sure how to interpret your lack of response here

10/14/24 3:46:18 PM EDT

+17176291559

➔ Replying to you, 2024-10-14 14:55:00: « how is it going with funding? are we going to be ok? »

Randall, I don't want to overstate things as I have in the past. I'm working diligently on it. I need to reprieve. I can update tomorrow afternoon.

10/14/24 3:47:09 PM EDT

OK, thanks, we have a lot to do this week. I'm just not sure how we're gonna get it out and that's gonna be some real problems so...

10/14/24 3:47:26 PM EDT

+17176291559

Are you talking merchants?

10/14/24 3:47:46 PM EDT

Yes, and vendors and superior

10/14/24 3:48:41 PM EDT

And we have payroll to get out this week as well. It's just so much money that I don't even know how we do anything other than payroll.

10/14/24 3:49:40 PM EDT

Cash Hits -- Oct 14 - 18	Amount	Due
August Customer Payments	\$ 700,000	10/14/24
September Merchant Payments	\$ 1,000,000	10/14/24
Misc. Urgent Payables	\$ 205,000	10/14/24
FNB	\$ 150,000	10/14/24
Square	\$ 60,000	10/15/24
Tax Payments		10/15/24
Superior	\$ 72,500	10/15/24
Clatworthy	\$ 120,000	10/15/24
Square	\$ 30,000	10/15/24
Square	\$ 30,000	10/15/24
Square	\$ 30,000	10/16/24
First Premier (cash provider)	\$ 117,700	10/16/24
Payroll	\$ 300,000	10/17/24
Ray Davis Settlement	\$ 200,000	10/17/24
Square	\$ 30,000	10/17/24
Square	\$ 30,000	10/18/24
Superior	\$ 2,990,000	10/18/24
	\$ 6,065,200	
Cash Balance Net of Outstanding checks	\$ 230,000	10/14/24
Surcharge Revenue	\$ 477,000	
Net Cash Needed	\$ 5,358,200	
Cash Hit Summary of Above		
Operating	\$ 2,442,700	
Non Operating	\$ 3,622,500	
	\$ 6,065,200	

10/14/24 3:52:08 PM EDT

Plus, Clatworthy is wanting to talk to you tomorrow. I suspect they're gonna shut us off if we don't have a good confident story for them.

10/14/24 3:53:19 PM EDT

I suspect their board directors is making a decision on whether they continue with us or not

10/14/24 3:54:00 PM EDT

Sorry to burden you with this, but it just feels like it's all gonna collapse this week

10/14/24 4:06:25 PM EDT

Can you bring in any cash this week or are we waiting for syndicate funding at this point?

10/14/24 4:40:27 PM EDT

We need \$250k additional this week to cover payroll, Clatworthy, FNB, square and first premier. No customer payments at all

10/14/24 6:38:21 PM EDT

From Upco regarding tax payments due tomorrow  
High level Kevin said 1.5M fed and 500K or so in all states

10/14/24 6:38:44 PM EDT

Will have returns for you tomorrow

10/14/24 6:38:49 PM EDT

Maybe tonight yet

10/14/24 6:39:11 PM EDT

+17176291559

We're a c corp. Can pay late.

I need to see the draft return. For all three entities to review.

10/14/24 6:40:16 PM EDT

Yep. Wasn't aware that we can pay late.

10/14/24 7:27:46 PM EDT

Tax returns emailed to you

10/14/24 7:30:16 PM EDT

**From Dennis**

Kevin sending you both PDF copies tonight. He and Daryl should talk about what happens with no payments. I don't want to be middle man. Liens penalties and interest.

10/15/24 7:48:04 AM EDT

Good morning Daryl. I hope you are feeling better. Can we please talk this morning? I have a bunch of questions that need answers only you can provide and texting is not very good to deal with this.

10/15/24 8:27:21 AM EDT

will you please ask FNB to hold their payment this week? we need to make payroll.

10/15/24 8:33:03 AM EDT

And square as well?

10/15/24 8:50:48 AM EDT

+17176291559

Apologies, still ill. I sent a text to Steve at FNB to ask for reprieve this week.

10/15/24 8:50:55 AM EDT

+17176291559

I just reached out to Square as well

10/15/24 8:50:58 AM EDT

thanks

10/15/24 8:51:24 AM EDT

do you have any cash at all that can be bought in for August customer payments?

10/15/24 8:51:39 AM EDT

+17176291559

I'm working on it

10/15/24 8:51:44 AM EDT

ok.

10/15/24 8:52:04 AM EDT

don't forget to review tax returns

10/15/24 8:52:21 AM EDT

I can email them to you if you like

10/15/24 8:53:20 AM EDT

also need to know how to respond to Ray Davis proposal.

10/15/24 8:54:05 AM EDT

they will start holding funds soon and proceeding with sale.

10/15/24 8:54:50 AM EDT

and Clatworthy is having a meeting today to discuss us. I assume he is communicating directly with you.

10/15/24 8:57:35 AM EDT

also, I need to know company valuation you are using on PFS for the following as Orrstown is requiring this of us by tomorrow.

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

10/15/24 8:57:37 AM EDT

Paramount Management Group LLC  
PowerCoin, LLC  
PowerQwest Financial, LLC  
First Regents Holdings, LLC

10/15/24 8:57:46 AM EDT

sorry to pound you

10/15/24 9:00:04 AM EDT

last question: what is the percent chances of us meeting October 21  
investor funding deadline?

10/15/24 9:25:46 AM EDT

+17176291559

Payment is October 30

10/15/24 9:25:54 AM EDT

ok. cool

10/15/24 9:25:57 AM EDT

what a relief

10/15/24 9:26:13 AM EDT

+17176291559

➔ Replying to you, 2024-10-15 08:53:20: « also need to know how to  
respond to Ray Davis proposal. »

Is there an email to review?

10/15/24 9:26:31 AM EDT

Ray Davis response

First, we note that a recent press article indicates that other investors are being paid off completely. Ray will not assume an inferior position, particularly in light of his unique rights to an Article 9 sale and his ability to defray and collect payments from your processors.

In light of the foregoing, Ray would be willing to settle upon the following terms:

- a payment of \$200,000 by October 17, 2024, whereupon we would be willing to postpone the Article 9 sale from October 21 to November 18, 2024
- a payment of \$1 million by November 15, whereupon we would be willing to postpone the Article 9 sale to January 2, 2025
- a final payment of \$900,000 by December 31, 2024

Please understand that in light of Ray's rights to pursue an Article 9 sale and to also collect from your processors, this counteroffer is not intended to be the starting point for additional lengthy negotiations. If we cannot come to an agreement in short order, Ray will fully exercise his rights, all of which are expressly reserved.

Please advise as to your client's response.

10/15/24 9:26:46 AM EDT

yes there is an email. I will send to you

10/15/24 9:27:18 AM EDT

+17176291559

What is the AU energy deal for 115 K that Steve signed?

10/15/24 9:28:41 AM EDT

customer who shut down a bunch of machines with \$3M cash connect cash in them. We agreed to pay their back rent and they agreed to turn them on again.

10/15/24 9:34:42 AM EDT

i have another \$50k of back rents due for two large customers who are going to leave us if we don't pay today. As we don't have cash, we need to walk away from this business.

10/15/24 9:44:22 AM EDT

what are we doing with \$2.9M due for Superior on Friday?

10/15/24 9:51:43 AM EDT

+17176291559

➔ Replying to you, 2024-10-15 09:28:41: « customer who shut down a bunch of machines with \$3M cash connect cash in them. We agreed to pay their ... »

And we can't extend that payment over to payment dates?

10/15/24 9:52:06 AM EDT

+17176291559

➔ Replying to you, 2024-10-15 09:44:22: « what are we doing with \$2.9M due for Superior on Friday? »

I'm looking to get this extended to the 30th as well. I already put out messages.

10/15/24 9:52:14 AM EDT

➔ Replying to you, 2024-10-15 09:44:22: « what are we doing with \$2.9M due for Superior on Friday? »

Liked "I'm looking to get this extended to the 30th as we..."

10/15/24 9:53:33 AM EDT

➔ Replying to you, 2024-10-15 09:28:41: « customer who shut down a bunch of machines with \$3M cash connect cash in them. We agreed to pay their ... »

No. They have been very difficult to work with. The machines have been down for about a month and cash connect is questioning so it won't be long till they subtract \$3m from us.

10/15/24 9:54:35 AM EDT

we owed them \$75k advance since the beginning of 2024 and they are done with us if we don't pay. This was a standard process we inherited from JA USA acquisition

10/15/24 10:20:17 AM EDT

steve just informed me that we lost a 50 location customer. Tired of us with payment issues.

10/15/24 11:05:49 AM EDT

email that I want to send to senior leadership team as an update on financing.

10/15/24 11:05:51 AM EDT

Privileged and Confidential

To all Sr Leaders:

Our plan for our senior leadership team meeting today was to inform you of any updates on our refinancing actions. Since we have limited updates to provide at this time, I decided to do this by email.

Daryl continues to work on financing options for us and has been providing funding to support us as is needed. Please continue to escalate both customer and supplier concerns to Steve and me so we can expedite.

As we discussed previously, we expect the investor refinance to also provide the additional liquidity that we need. We expect this process to be completed by November 20.

Thank you for all that you are doing to work through these challenges and we are grateful for your ability to adapt and stay focused on our core values.

10/15/24 11:05:54 AM EDT

you ok with this?

10/15/24 11:16:14 AM EDT

Daryl?

10/15/24 12:25:16 PM EDT

also, upco asked what we are doing with tax returns. Did you get a chance to look at these?

10/15/24 3:36:13 PM EDT

Did you review tax returns?

10/15/24 4:03:01 PM EDT

+17176291559

Joe does not stop calling. He hat amount is he asking for? Can it be checks sent out?

10/15/24 4:03:48 PM EDT

I will find out



10/15/24 4:03:59 PM EDT

+17176291559

Have no idea what he's asking me to prove

10/15/24 4:04:03 PM EDT

+17176291559

Approve

10/15/24 4:04:04 PM EDT

Ok

10/15/24 6:33:21 PM EDT

You ok with tax returns? Upco said they are waiting for a response.

10/15/24 6:45:43 PM EDT

+17176291559

Approved

10/15/24 6:51:21 PM EDT

Liked "Approved "

10/15/24 7:03:37 PM EDT

Please see email that I just sent you need to approve the allocation of the income to you away from Dennis and me

10/15/24 7:05:29 PM EDT

Kevin won't release without your approval

10/15/24 7:17:23 PM EDT

Please?

10/16/24 7:38:40 AM EDT

good morning Daryl. As I don't have the APA for our sale of Cypress to Cash Depot and PAI, PAI is asking for confirmation of the following:

10/16/24 7:38:41 AM EDT

Can one of you please confirm the following details?

- 1 Cash Depot has completed the purchase of Cypress from Paramount Management Group.
- 2 The effective date of the purchase was September 27, 2024.
- 3 All Cypress revenue payments from that date forward need to be remitted to Cash Depot.

10/16/24 7:38:56 AM EDT

do we agree with these statements?

10/16/24 7:39:39 AM EDT

+17176291559

Apologies I did not send it. I will when I get to my computer. I'm out right now. Yes they look accurate.

10/16/24 7:39:49 AM EDT

+17176291559

➔ Replying to you, 2024-10-15 19:05:29: « Kevin won't release without your approval »

I did last night

10/16/24 7:39:49 AM EDT

thanks

10/16/24 7:39:53 AM EDT

thanks!

10/16/24 7:43:53 AM EDT

are you local today? want to grab dinner and drinks at Tequila?

10/16/24 7:44:29 AM EDT

assuming you are feeling well enough.

10/16/24 7:44:37 AM EDT

I need some face time with you again. Thanks

10/16/24 7:51:59 AM EDT

will you please give me current value of the following entities. Orrstown needs our PFS and tax return today and already sent us a warning of default if we don't provide.

10/16/24 7:52:25 AM EDT

Paramount Management Group LLC  
PowerCoin, LLC  
PowerQwest Financial, LLC  
First Regents Holdings, LLC

10/16/24 9:43:00 AM EDT

Daryl will you please provide this information?

10/16/24 9:43:29 AM EDT

any chance we get cash in soon? starting to go off the rails with customers.

10/16/24 10:11:11 AM EDT

we have a \$22k August and September rent payment due today. If we don't pay they are removing the machines. \$2k per month in GP.

10/16/24 10:25:49 AM EDT

Daryl for TNT September Rents — \$36k checks — \$26k ACH. total \$62k

10/16/24 10:27:53 AM EDT

i have a Palms casino with three locations due \$16k for August and September. We need to pay today or they are tossing us. \$700 per month in GP.

10/16/24 10:33:26 AM EDT

plus we have that \$110k rent due today or they are locking up machines with \$3M in cash connect cash and will hold it until we pay. If we pay today, they turn the machines on. If we don't pay today, we still pay regardless but lose the business. We risk CashConnect hitting us for the cash in the machines as they are turning away armored carriers.

10/16/24 12:39:10 PM EDT

also, based on what Dennis is telling me about Margo — I think I need to resign and give up my stock there as well.

10/16/24 12:39:22 PM EDT

I will do the same as Dennis and get docs for you.

10/16/24 12:40:29 PM EDT

he said they are taking customer money but not giving them bitcoin in return.

10/16/24 12:46:59 PM EDT

LNP | LancasterOnline: Buyout payments pushed back for investors in Lancaster-based ATM network

10/16/24 12:47:02 PM EDT

[https://lancasteronline.com/business/local\\_business/buyout-payments-pushed-back-for-investors-in-lancaster-based-atm-network/article\\_c22d7608-8bce-11ef-bdf0-b3ffc8a733d8.html](https://lancasteronline.com/business/local_business/buyout-payments-pushed-back-for-investors-in-lancaster-based-atm-network/article_c22d7608-8bce-11ef-bdf0-b3ffc8a733d8.html)

10/16/24 12:47:02 PM EDT

Buyout payments pushed back for investors in Lancaster-based ATM network

10/16/24 2:34:31 PM EDT

➔ Replying to you, 2024-10-16 07:52:25: « Paramount Management Group LLC  
PowerCoin, LLC  
PowerQwest Financial, LLC  
First Regents Holdings, LLC  
»

Daryl, can you provide this information please?

10/17/24 9:34:26 AM EDT

good morning Daryl — we are scheduled for 1:1 today at 1. I would like to have this meeting as I have a number of items to discuss.

10/17/24 9:42:47 AM EDT

Also, don't forget that \$2.99M payment is due tomorrow for Superior.

10/17/24 10:00:09 AM EDT

also, we need to respond to Ray Davis or he instructs processor to direct revenue to his bank account.

10/17/24 11:44:53 AM EDT

I think the Ray Davis thing occurs on Monday

10/17/24 2:54:08 PM EDT

+17176291559

➔ Replying to you, 2024-10-17 09:42:47: « Also, don't forget that \$2.99M payment is due tomorrow for Superior. »

I already asked to push this back to the 31st

10/17/24 2:54:18 PM EDT

+17176291559

➔ Replying to you, 2024-10-17 10:00:09: « also, we need to respond to Ray Davis or he instructs processor to direct revenue to his bank account. »

Who is the email from that I need to review

10/17/24 2:54:30 PM EDT

+17176291559

➔ Replying to you, 2024-10-17 09:34:26: « good morning Daryl — we are scheduled for 1:1 today at 1. I would like to have this meeting as I hav... »

I apologize as I've been underwater

10/17/24 2:54:36 PM EDT

No worries.

10/17/24 2:55:19 PM EDT

Just resent to your inbox

10/17/24 3:25:29 PM EDT

Torosian is emailing too

10/17/24 3:32:04 PM EDT

Anything on Superior? Really worries me.

10/18/24 7:59:31 AM EDT

good morning Daryl — I received the following email from Samantha.

10/18/24 7:59:33 AM EDT

Hi Randall, Dennis & Steve:

With the sale of the Cypress portfolio to Cash Depot, can you please describe how the ongoing monthly GP will be handled and who will be calculating that?

We are also due approximately \$15,000 for August's GP and of course almost \$5 million for the original purchase of our company. Can you address when those will be paid or by whom?

I have attempted in every way to hand off a well-organized company and to live up to all of my agreements as per my APA with Paramount. I continue to make myself available to your team and now to Cash Depot. Is there really nothing any of you can do to help facilitate a payment of any amount to me for amounts now past due?

Sincerely,

Samantha Guthrie

10/18/24 8:04:15 AM EDT

also, just wanted to confirm my expectation based on our conversation that you will purchase my stock at the two investor payment dates at 70% and 30% respectively. Again, I remain committed to working with you.

10/18/24 9:30:27 AM EDT

I know you have alligators all around you right now. But as I told you when we talked that I can deal with just about anything when I know my personal financial life is in order so this is really important to me.

10/18/24 9:33:47 AM EDT

+17176291559

I'm also keeping Margo float right now and working with Chicago Atlantic. This asset is going to be worth a lot of money. If you want to drop it you can but you need to hear what occurring.

10/18/24 9:34:00 AM EDT

+17176291559

I can pay for a deal with you next week. Do you want to structure it similar to Denis?

10/18/24 9:35:07 AM EDT

I'm OK leaving Margo as is for now and staying on the cap table. Prefer to just cash out on Paramount right now.

10/18/24 9:36:06 AM EDT

Regarding Paramount, I'm willing to exit from Paramount cap Table at this point. Not sure what you're referring to with Dennis's deal but need cash now.

10/18/24 9:38:27 AM EDT

I plan to stay on a CEO of Paramount however also willing to take a role at Heller cap if you prefer. That might help pull some comp overhead out of Paramount but not sure what you're thinking.

10/18/24 9:41:31 AM EDT

I socialized \$7.1M as PMG buyout only. Is that what you were thinking?

10/18/24 10:34:36 AM EDT

Here is what we discussed when we met at Tequila.

10/18/24 10:34:38 AM EDT

Original Purchase-Randall Stock	
Cash October 30	\$ 2,000,000
Cash November 30	\$ 5,100,000
Daryl Beach House Equity	\$ 2,980,000
	\$ 9,080,000
Role/Position	
Continue on CEO of Paramount	
and/or senior whatever role	
Comp/Benefits continuing	
Beach House Data	
Purchase Price	\$ 5,100,000
Offer Value	\$ 5,100,000
Mortgage Balance	\$ 3,840,000
Equity	\$ 1,260,000
Daryl Share	\$ 1,980,000 10%
Netted Share	\$ 980,000 10%

10/18/24 10:35:10 AM EDT

However, I'm ok not doing anything with the beach house. In which case, following is what would occur.

10/18/24 10:35:21 AM EDT

Randall PMG Stock Sale		
Cash October 30	\$ 4,970,000	70%
Cash November 30	\$ 2,130,000	30%
	\$ 7,100,000	

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

10/18/24 10:42:56 AM EDT

thoughts?

10/18/24 11:05:14 AM EDT

I need to know what you are thinking so I can plan accordingly please.  
Realize you are swamped.

10/18/24 11:49:02 AM EDT

from our legal regarding Sharenet

10/18/24 11:49:03 AM EDT



10/18/24 11:49:03 AM EDT

Daryl and Randall,

See below from Sharenet's counsel. Absent a settlement, they intend to move forward with collecting payments directly from Sharenet's customers.

Devin

From: Alcott, Lee <lalcott@barclaydamon.com (mailto:lalcott@barclaydamon.com)>

Sent: Thursday, October 17, 2024 4:07 PM

To: Chwastyk, Devin <DChwastyk@mcneeslaw.com (mailto:DChwastyk@mcneeslaw.com)>

Cc: Daniel Berman - Hancock & Estabrook, LLP (dberman@hancocklaw.com (mailto:dberman@hancocklaw.com)) <dberman@hancocklaw.com (mailto:dberman@hancocklaw.com)>

Subject: Sharenet

[EXTERNAL]

Gentlemen, please be advised that if the payment referenced in my prior correspondence of October 11, 2024 is not made by noon tomorrow, we intend to send out collection letters including to the processors.

Thank you for your attention.

Lee Alcott

Lee Alcott

Partner

10/18/24 12:09:52 PM EDT

+17176291559

I started to respond yesterday and did not hit send. I'll get it back to you.

10/18/24 12:09:58 PM EDT

+17176291559

Are you sure you don't see anything?

10/18/24 12:10:43 PM EDT

I don't have anything you asked for the email and I forwarded but didn't get a response

10/18/24 12:20:16 PM EDT

please send me the Cypress sale docs.

10/18/24 12:20:46 PM EDT

also, please respond to my earlier questions regarding buyout. thanks

10/18/24 1:55:10 PM EDT

for Dennis' promissory note. Questions from Gierach email

10/18/24 1:55:11 PM EDT

Daryl and Randall—attached is the updated note for Dennis that contains the following provisions:

- Payments begin September 1, 2025 (annual) through September 1, 2032
- Minimum of \$2,953,852 if no sale has occurred prior to that
- If sale occurs prior to Sept 1, 2025, the payment amount will be 5% of net proceeds available for distribution to PMG members
- Principal at 4% annual interest in any event
- If a sale occurs subsequent to the start of payments, the note currently provides that Dennis is paid the difference of any amount over \$2,500,000—Is this correct? Should it be over \$2,953,852?

With your feedback/confirmation, I can finalize and send over to Dennis' atty.

10/18/24 1:55:18 PM EDT

need your response on these.

10/18/24 1:55:21 PM EDT

please

10/18/24 1:56:10 PM EDT

+17176291559

I gave remind to Dennis yesterday. He's responding with legal.

10/18/24 1:56:56 PM EDT

i forwarded this to Dennis so he could look at it. he is sending to counsel

10/18/24 2:24:56 PM EDT

➔ Replying to you, 2024-10-18 10:35:21: (Image)

thoughts on this?

10/18/24 4:53:14 PM EDT

Daryl?

10/18/24 5:07:56 PM EDT

**From Gierasch**

Hey Daryl—just to confirm your email offer below. Are you agreeing to pay \$2.1M as follows:

- \$300,000 by Nov 1, 2024
- \$1.1M by November 15, 2024
- \$700,000 by December 31, 2024

10/19/24 8:26:47 AM EDT

➔ Replying to you, 2024-10-18 10:35:21: (Image)

Good morning. Daryl are we confirmed with this plan?

10/19/24 8:29:46 AM EDT

+17176291559

➔ Replying to you, 2024-10-18 10:35:21: (Image)

You're now asking me to pay you 7 million cash in the next couple weeks?

10/19/24 8:30:24 AM EDT

Yes. That's what I thought we discussed. Or tried to make it easier with beach house.

10/19/24 8:30:28 AM EDT

+17176291559

➔ Replying to you, 2024-10-18 17:07:56: « Hey Daryl—just to confirm your email offer below. Are you agreeing to pay \$2.1M as follows:

... »

If this is Sharennet, yes

10/19/24 8:30:40 AM EDT

Ok

10/19/24 8:31:06 AM EDT

➔ Replying to you, 2024-10-18 17:07:56: « Hey Daryl—just to confirm your email offer below. Are you agreeing to pay \$2.1M as follows:

... »

This is sharenet. Thanks.

10/19/24 8:35:52 AM EDT

➔ Replying to you, 2024-10-18 10:34:38: (Image)

This is what we discussed when we were together

10/19/24 8:36:31 AM EDT

+17176291559

Definitely on the economics. I think we missed each other on payment dates.

10/19/24 8:36:41 AM EDT

+17176291559

Let me review it

10/19/24 8:36:56 AM EDT

Thanks I thought we were clear.

10/19/24 8:37:40 AM EDT

I remember discussing with you that I can't wait until we decide to sell the company sometime down the road. And with the liquidity that's occurring and investors getting paid out. I think it's my time to get paid out as well.

10/19/24 8:38:48 AM EDT

+17176291559

➔ Replying to you, 2024-10-18 10:34:38: (Image)

Yes, definitely payouts. Just let me review it. I'm overwhelmed, trying to ensure the funding and keep Margo alive and Paramount alive.

10/19/24 8:40:21 AM EDT

Thanks. I realize you are dealing with all of this and don't want to burden you further but this is really important to me and my family.

10/19/24 9:06:41 AM EDT

+17176291559

I'm fully committed just need a review the date

10/19/24 9:07:08 AM EDT

Thanks Daryl. Really appreciate it.

10/21/24 8:50:10 AM EDT

Good morning Daryl — apologies for pounding you on this topic, but as this is really important to me, I would like to know what you are thinking here please. Thanks

10/21/24 11:36:19 AM EDT

Also I must speak with you today please. Need to discuss Dennis transition and communication

10/21/24 1:31:04 PM EDT

Can we meet for drinks tonight at tequila?

10/21/24 2:27:05 PM EDT

Hello?

10/21/24 2:28:20 PM EDT

+17176291559

On with  
Bailing it out today. Will have plan on Margo to show and Dennis shetly

10/21/24 2:28:51 PM EDT

ok. can we meet tonight?

10/21/24 2:29:10 PM EDT

I need to talk to Brandon tomorrow and want to get your blessing on what I'm proposing.

10/21/24 3:30:26 PM EDT

will you please docusign dennis agreements in your inbox

Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

10/21/24 4:03:43 PM EDT

are you available to meet tonight?

10/21/24 4:54:15 PM EDT

+17176291559

I'm with Margo developing the bailout plan

10/21/24 4:56:13 PM EDT

Can we chat tomorrow morning?

10/21/24 5:04:00 PM EDT

First thing?

10/21/24 6:29:48 PM EDT

+17176291559

We are here until late. Yea in morning.

10/21/24 6:32:34 PM EDT

Ok

10/22/24 8:07:18 AM EDT

When are you able to talk?

10/22/24 8:08:51 AM EDT

Good morning by the way.

10/22/24 8:37:34 AM EDT

Cash Out	Investors/Loan Holders/Non Operating
\$ 2,990,000	Superior
\$ 200,000	Square
\$ 1,372,158	Orrstown
\$ 1,834,663	FNB LOC
\$ 7,100,000	Randall Leaman Stock
\$ 2,100,000	Ray Davis
\$ 4,150,000	Samantha
\$ 977,862	Kamy (Just ATMs USA) Holdback
\$ 5,000,000	Restore Paramount Ops Liquidity
\$ 653,349	Rabah Projects -- Capex
\$ 700,000	Cash Connect Catch up
\$ 27,078,032	Total

10/22/24 8:38:05 AM EDT

Paramount's cash needs as I know them at this moment

10/22/24 8:38:14 AM EDT

when are you available to chat.

10/22/24 8:53:41 AM EDT

Cash Out	Investors/Loan Holders/Non Operating
\$ 2,990,000	Superior
\$ 200,000	Square
\$ 1,834,663	FNB LOC
\$ 7,100,000	Randall Leaman Stock
\$ 2,100,000	Ray Davis
\$ 4,150,000	Samantha
\$ 977,862	Kamy (Just ATMs USA) Holdback
\$ 5,000,000	Restore Paramount Ops Liquidity
\$ 653,349	Rabah Projects -- Capex
\$ 2,000,000	2023 C Corp Taxes Due
\$ 700,000	Cash Connect Catch up
\$ 27,705,874	Total

10/22/24 8:54:13 AM EDT

updated. removed Orrstown and added 2023 C Corp taxes

10/22/24 9:02:18 AM EDT

I rescheduled my meetings this morning so I am completely open.

10/22/24 9:28:11 AM EDT

I need some quality time with you please. Can't be a quick 5 minute conversation. This is important. I want to appoint Brandon as CFO but he needs to know our future. Particularly funding is his number one question and has asked this of me a couple of times.

10/22/24 9:28:47 AM EDT

I'm trying to retain him and think I can if I can give him something we can commit to.

10/22/24 10:20:31 AM EDT

Daryl?

10/22/24 11:15:26 AM EDT

Please respond

10/22/24 11:17:37 AM EDT

+17176291559

I've been w orrstown. Will call you when done.

10/22/24 11:17:53 AM EDT

ok

10/22/24 11:21:07 AM EDT

can I meet you somewhere so we can talk in person?

10/22/24 11:52:04 AM EDT

+17176291559

Do you want me to call you for five minutes or try to meet this afternoon?

10/22/24 11:52:31 AM EDT

Try to meet please

10/22/24 11:54:43 AM EDT

Will you please docusign Dennis docs so this is done?

10/22/24 12:13:09 PM EDT

What time and where do you want to meet?

10/22/24 1:33:16 PM EDT

Daryl?

10/22/24 1:33:37 PM EDT

+17176291559

Randall?

10/22/24 1:33:39 PM EDT

+17176291559

:)



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10/22/24 1:33:47 PM EDT

haha

10/22/24 1:33:49 PM EDT

+17176291559

I don't think you have any grass, but what I'm trying to pull off for Paramount and now Margo.

10/22/24 1:34:10 PM EDT

+17176291559

Do you want to try to meet at 330-4.

10/22/24 1:34:14 PM EDT

+17176291559

I prefer phone call, but I can meet

10/22/24 1:34:16 PM EDT

yes.

10/22/24 1:34:56 PM EDT

prefer to meet so I have your undivided attention. I don't mind meet outside if you need some grass 😊

10/22/24 1:36:45 PM EDT

Here's my agenda;

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+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

10/22/24 1:36:47 PM EDT

- Docusign Dennis docs?
- Brandon CFO
- Employment agreement
- Comp
- Bonus
- Equity participation
- Health insurance and deductibles paid by company.
- Paramount funding
- Timing
- Amount
- Superior
- Orrstown company valuation
- Orrstown financials tax return showing a loss for 2023 for  
First Regents
- C corp tax payment
- Office
- My stock
- Pitney lease
- PowerCoin

10/22/24 1:37:46 PM EDT

- ☐ ~~Docusign~~ Dennis docs?
- ☐ Brandon CFO
  - ☐ Employment agreement
  - ☐ Comp
  - ☐ Bonus
  - ☐ Equity participation
  - ☐ Health insurance and deductibles paid by company.
- ☐ Paramount funding
  - ☐ Timing
  - ☐ Amount
- ☐ Superior
- ☐ Orrstown company valuation
- ☐ Orrstown financials tax return showing a loss for 2023 for Fir:
- ☐ C corp tax payment
- ☐ Office
- ☐ My stock
- ☐ Pitney lease
- ☐ PowerCoin

10/22/24 1:37:52 PM EDT

easier to read this.

10/22/24 1:49:58 PM EDT

meet at your house at 3:30?

10/22/24 1:51:05 PM EDT

+17176291559

Yes!

10/22/24 1:51:25 PM EDT

Cool. See you then.

10/22/24 2:14:14 PM EDT

can we send \$70k to Clatworthy?

10/22/24 2:17:05 PM EDT

+17176291559

Yea

10/22/24 3:13:50 PM EDT

+17176291559

345

10/22/24 3:13:54 PM EDT

Ok

10/22/24 3:42:13 PM EDT

+17176291559

I need a couple minutes yet and I'll come out and get you. Just let me know when here.

10/22/24 3:42:40 PM EDT

OK, no problem. I'm pulling up now.

10/22/24 3:44:13 PM EDT

Here

10/22/24 3:44:51 PM EDT

+17176291559

Need 5

10/22/24 3:44:58 PM EDT

Ok. Take your time

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10/22/24 5:16:03 PM EDT

Amount	Date	
\$ 2,367,000	10/30/24	
\$ 2,367,000	11/20/24	
\$ 2,366,000	3/23/24	
\$ 7,100,000		

10/22/24 5:16:33 PM EDT

Here's what I'm thinking would feel good to me. 3/23/25 is my 60th bday.

10/22/24 5:29:00 PM EDT

does this work for you?

10/22/24 6:30:24 PM EDT

+17176291559



10/22/24 6:30:39 PM EDT

+17176291559

Don't know how he is getting my number, but please call him

10/22/24 6:30:50 PM EDT

Liked "Don't know how he is getting my number, but please..."

10/22/24 7:43:38 PM EDT

Are there any office spaces at Margo? We could help share in the rent there for a few offices.

10/22/24 9:50:33 PM EDT

+17176291559

Yeah!

10/22/24 9:51:02 PM EDT

Should I talk to Austin about this ?

10/22/24 9:51:20 PM EDT

+17176291559

Let's talk first

10/22/24 9:51:26 PM EDT

Liked "Let's talk first "

10/22/24 10:57:03 PM EDT

How do you want to handle the beach house mortgage in our transaction? Are we paying it off at some point? Just wanting to plan for this so I can plan accordingly

10/22/24 10:57:34 PM EDT

+17176291559

Drinking heavily. Talk tomorrow

10/22/24 11:01:28 PM EDT

Haha!

10/22/24 11:01:37 PM EDT

Same here 😊

10/22/24 11:02:06 PM EDT

+17176291559

Loved "Haha!"

10/23/24 8:35:58 AM EDT

Good morning Daryl can I tell everyone with reasonable certainty that by the end of next week we will have our customers current on rent? Getting pounded every day on issues and I think that would be a breath of fresh air. No one's really worried about vendors at this point anyway.

10/23/24 8:36:15 AM EDT

Because with vendors, we just leak a little money to them which quiet them down and we can keep going at this pace for sometime

10/23/24 8:39:29 AM EDT

Also, what are your thoughts on the Margo office? We have two months to move and need to know what's going on very soon and communicate that to the team. Can we leave our office furniture in the office that we are in now or do we need to take that along?

10/23/24 10:31:27 AM EDT

Also, are we allowed to resume disposal of the ATMs in the warehouse? I'd like to get that cleaned up so we can get our rent reduced as soon as possible.

10/23/24 3:11:44 PM EDT

Daryl, I just spoke to Brandon: 1. He is excited about the opportunity. 2. He is worried about funding moving forward and will you provide what we need to be a healthy company even though I relayed that we'll have \$4M by end of November and another \$1M by end of December. 3. He is worried about being an officer and seeing his name in the paper and/or other legal exposure based on where we are today. I told him that we can promote him to SVP of Finance have him function on the exec team in the role of CFO without the title. I will take the title of CFO until he feels comfortable with where the company is positioned. Net Net, he is going to speak to his legal and get back to me by Friday.

10/24/24 6:57:36 AM EDT

Good morning Daryl. Will you please respond to the following?

10/24/24 6:57:50 AM EDT

➔ Replying to you, 2024-10-23 08:39:29: « Also, what are your thoughts on the Margo office? We have two months to move and need to know what's... »

This one

10/24/24 6:58:16 AM EDT

➔ Replying to you, 2024-10-23 08:35:58: « Good morning Daryl can I tell everyone with reasonable certainty that by the end of next week we will ... »

And this one

10/24/24 6:35:37 PM EDT

Need your help with Brandon. He is feeling a little uneasy and needs some thoughts from you about what the future looks like

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+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753Text message  
10/24/24 6:44:22 PM EDT

Everything ok? You haven't responded much for the past two days.

10/24/24 6:44:33 PM EDT

Brandon mentioned this too

iMessage  
10/24/24 8:26:31 PM EDT

Will you please send me the closing docs for cypress? Gierasch needs to respond to cypress legal but we don't know how the deal is structured

10/24/24 9:07:48 PM EDT

I'm meeting with him tomorrow morning.

10/24/24 9:08:30 PM EDT

+17176291559

In closing deal. Apologies. Yes I'll send when back to computer

10/24/24 9:08:35 PM EDT

+17176291559

I'm good

10/24/24 9:08:41 PM EDT

Good. Thanks.

10/25/24 8:19:26 AM EDT

good morning Daryl — just a reminder that I need the docs for Cypress sale

10/25/24 8:41:45 AM EDT

I'm meeting with Gierasch at 10 am so the sooner the better.

10/25/24 8:43:49 AM EDT

also, can you bring in any cash today? we are in real trouble on several fronts right now

10/25/24 8:45:15 AM EDT

Customers, partner payments, clatworthy, Puerto Rico, armored carriers, etc.

10/25/24 10:02:25 AM EDT

need Cypress docs please.

10/25/24 10:56:19 AM EDT

Just got this from Clatworthy

10/25/24 10:56:20 AM EDT

We are going to regrettably have to stop funding today. Daryl said that he can not get us \$105 K today. We can not allow hole to get deeper. This will regrettably likely cost added cost to start back up with Unscheduled replenishments, ECs etc.

10/25/24 10:57:37 AM EDT

very bad for us

10/25/24 10:58:04 AM EDT

+17176291559

Cypress sent

10/25/24 10:58:16 AM EDT

got it. thanks

10/25/24 10:58:18 AM EDT

+17176291559

Thought he was asking for 70k

10/25/24 10:58:25 AM EDT

+17176291559

I text him.

10/25/24 10:58:42 AM EDT

that's what he asked for yesterday

10/25/24 10:58:51 AM EDT

\$70k that is

10/25/24 2:49:22 PM EDT

Our Sr accountant just resigned.



10/25/24 2:53:16 PM EDT

Really need you to meet face to face with team here.

10/25/24 2:53:35 PM EDT

I'm ok with a few losses but worried that it will accelerate

10/25/24 2:56:35 PM EDT

Also we have a \$13k GP per month relationship that is needed \$78k payment to Diebold service provider. ATM is down.

10/25/24 2:59:36 PM EDT

Clatworthy is not allowing us to onboard 50 terminals from another service provider. Can you respond to his text asking about \$110k on Monday?

10/25/24 4:27:19 PM EDT

Daryl, we don't have cash if he's gonna get a 30 K wire today it's gonna have to come from you. CDS missed the wire deadline.

10/26/24 8:27:00 AM EDT

Good morning Daryl. I am needing to coordinate the date of pay down of my mortgage and wanted to know if you are confident that I will

10/26/24 8:27:33 AM EDT

Get my first payment on the 31st.

10/26/24 8:55:19 AM EDT

Also can you find time to meet in person with me early next week to talk to the finance team?

10/26/24 1:28:40 PM EDT

Hello Daryl realize you are swamped but I would like a response here please. 🙏

10/26/24 1:59:01 PM EDT

Also, what are you thinking about the beach house mortgage and how we will handle moving forward?

10/27/24 8:41:16 PM EDT

+17176291559

Apologies as I was underground all weekend. Message in morning.

10/27/24 8:41:40 PM EDT

No worries. Glad you got some time off.

10/28/24 9:19:24 AM EDT

Good morning Daryl, consolidating all of my questions here to make it easier for you so you don't need to read back text messages:

10/28/24 9:19:26 AM EDT

1. Am I getting my first payment this week? If so, when as I need to find out payoff for my mortgage
2. Is Paramount getting funding this week? If so, how much?
3. Can you meet face to face with Finance team this week? If so, when?
4. What are your thoughts regarding the beach house mortgage as I need to plan accordingly?
5. Margo office – I would like to announce this week that we are moving there plus going to an expanded work from home schedule. What do I need to do to make this happen ?
6. Are you paying Superior this week?
7. May we resume investor ATM disposal now so we can clean out warehouse and reduce rent?

10/28/24 9:54:46 AM EDT (Edited 10/28/24 9:55:11 AM EDT)

also, please see Gierasch and my emails regarding agreement for purchasing my stock.

Edited

10/28/24 10:17:04 AM EDT

I would really like responses this morning as my whole week is dependent on these. Thanks

10/28/24 12:32:42 PM EDT

Are you going to respond to Clatworthy?

10/28/24 1:03:43 PM EDT

+17176291559

I am working on everything for 31st. Probably going to be Friday or Monday. Not ignoring.

10/28/24 1:04:11 PM EDT

ok. thanks. need answers on everything here please.

10/28/24 1:20:50 PM EDT

on with Steve right now. He said Clatworthy is really frustrated with us right now. I fear them walking from us.

10/28/24 1:27:07 PM EDT

+17176291559

Are you with Fulton bank personally?

10/28/24 1:27:18 PM EDT

no.

10/28/24 1:27:25 PM EDT

+17176291559

Or credit union. Is Dennis?

10/28/24 1:27:37 PM EDT

i have a credit union

10/28/24 1:27:41 PM EDT

I don't know

10/28/24 1:28:04 PM EDT

I have an investment account with Fidelity

10/28/24 1:28:05 PM EDT

+17176291559

Can you move cash in your account as I dont trust Chris with garnishment. He is being a bully even though he knows payoff is occurring

10/28/24 1:28:23 PM EDT

yes

10/28/24 1:28:29 PM EDT

+17176291559

If you have material cash in your account I would move it to fidelity

10/28/24 1:28:32 PM EDT

we can wire into my fidelity account

10/28/24 1:28:43 PM EDT

I have \$2k in my account.

10/28/24 1:28:48 PM EDT

+17176291559

No, I meant wire your personal cash into another account to be sure

10/28/24 1:28:52 PM EDT

+17176291559

If 2k then no worries

10/28/24 1:29:08 PM EDT

shit

10/28/24 1:29:25 PM EDT

my credit union account is a joint account

10/28/24 1:29:46 PM EDT

with my wife.

10/28/24 1:30:05 PM EDT

+17176291559

I dont know that anything will happen

10/28/24 1:30:16 PM EDT

he won't wait until the end of the week?

10/28/24 1:30:37 PM EDT

+17176291559

It's just his way of applying additional pressure

10/28/24 1:31:02 PM EDT

jesus

10/28/24 1:31:11 PM EDT

My wife will absolutely trip

10/28/24 1:37:40 PM EDT

+17176291559

I just called him, he did not answer

10/28/24 1:38:09 PM EDT

who is him?

10/28/24 1:56:03 PM EDT

they will likely take my wages at paramount

10/28/24 1:56:20 PM EDT

+17176291559

Chris

10/28/24 1:56:30 PM EDT

+17176291559

Yatooma

10/28/24 1:56:37 PM EDT

+17176291559

No, I don't think Krys will do that. I'm waiting for him to respond back.

10/28/24 1:57:22 PM EDT

well, we didn't think he'd do any of this and here we are

10/28/24 2:00:31 PM EDT

are you 100% paying Chris this week?

10/28/24 2:01:41 PM EDT

The garnishment will be for my wages.

10/28/24 2:02:27 PM EDT

In addition to bank accounts

10/28/24 2:05:20 PM EDT

+17176291559

He just responded that he's a doctors with his mom

10/28/24 2:05:30 PM EDT

+17176291559

Callbig me shortly

10/28/24 2:05:35 PM EDT

ok.

10/28/24 2:05:48 PM EDT

you need to let Dennis know what is happening here

10/28/24 2:05:51 PM EDT

+17176291559

That is only IRS. He cannot do that.

10/28/24 2:05:58 PM EDT

ok

10/28/24 2:06:37 PM EDT

➔ 2024-10-28 13:03:43: « I am working on everything for 31st. Probably going to be Friday or Monday. Not ignoring. »

this is my payment you are referring to here?

10/28/24 2:06:53 PM EDT

+17176291559

Yes

10/28/24 2:06:57 PM EDT

+17176291559

And superior

10/28/24 2:07:01 PM EDT

cool. thanks.

10/28/24 2:07:08 PM EDT

and both are 100% assured?

10/28/24 2:21:45 PM EDT

Questioned "and both are 100% assured?"

10/28/24 2:39:16 PM EDT

Daryl are you sure these are going to happen?

10/28/24 2:41:47 PM EDT

we lost cornerstone bank. \$13k per month GP

10/28/24 2:46:58 PM EDT

+17176291559

Randall, I'm on the phone dealing with it right now. 100% is an impossible commitment to make. Very confident by early next week it will be resolved. And hopeful this week.

10/28/24 2:47:12 PM EDT

+17176291559

What did we wire John? How much more did we need to wire him?

10/28/24 3:43:29 PM EDT

May I please get 15 minutes of your time today for a quick chat?

10/28/24 4:32:04 PM EDT

Brandon is not accepting a promotion at this time. Too much uncertainty and worried about potential legal repercussions. Found out we have another person actively looking to leave.

10/28/24 4:32:19 PM EDT

We are going to try to save but might be too late.

10/29/24 8:02:54 AM EDT

Good morning Daryl, meeting with various leadership teams this week. Just to be clear I wanted to make sure I understood what you said earlier. Are we expecting the roughly \$3 million for Paramount that we discussed last week when this next round of funding occurs for the investors at the end of this week?

10/29/24 8:06:00 AM EDT

I just wanna be able to offer some encouraging news as we're losing customers

10/29/24 8:49:46 AM EDT

+17176291559

Randall, sorry for the delay. Literally on calls nonstop trying to close out. We are close. I need more time to respond to you and hopefully later today

10/29/24 8:50:11 AM EDT

Loved "Randall, sorry for the delay. Literally on calls n..."

10/29/24 11:17:41 AM EDT

For your thinking regarding a settlement with Samantha for Cypress — we need to eliminate the monthly GP payment and calculation when you settle with her on a final payment. We have an ongoing obligation to pay this until we sell a majority control of Paramount. We can't forget to eliminate this when you are negotiating with her.

10/29/24 1:19:46 PM EDT

Frank Deluca sent an email. They are taking over the terminals in Chicago.

10/29/24 2:02:45 PM EDT

+17176291559

Sorry closing this deal

10/29/24 2:02:55 PM EDT

+17176291559

How much do we have for payroll tomorrow?

10/29/24 2:03:15 PM EDT

+17176291559

Need to push to JBT as we can NOT risk FNB



10/29/24 2:03:21 PM EDT

We only have \$240K in cash currently.

Payroll is \$285K  
Medical Insurance is \$82K  
Totals \$367K

We are short \$127K to meet the above

10/29/24 2:03:24 PM EDT

+17176291559

How much did we send CLathrowthy

10/29/24 2:03:33 PM EDT

\$100k yesterday

10/29/24 2:03:43 PM EDT

+17176291559

Need to push of medicinal insurance for a couple days

10/29/24 2:03:53 PM EDT

+17176291559

That goes to Heller Capital, correct?

10/29/24 2:04:08 PM EDT

+17176291559

With Tomorrow we should be able to cover?

10/29/24 2:04:19 PM EDT

i believe so. but not sure.

10/29/24 2:04:20 PM EDT

+17176291559

Please move money to JBT

10/29/24 2:36:27 PM EDT

Daryl we barely have enough cash to make payroll tomorrow and will likely bounce checks.

10/29/24 2:36:43 PM EDT

without additional cash from you, we cannot pay Clatworthy \$75k today

10/29/24 2:37:22 PM EDT

we need to know what do now as we have until 3 today to wire

10/29/24 2:47:19 PM EDT

Daryl? you need to communicate with Clatworthy as we can't risk losing cash for our machines.

10/29/24 2:53:18 PM EDT

+17176291559

I reached out to him

10/29/24 2:53:25 PM EDT

Ok. Thanks

10/29/24 4:00:14 PM EDT

Daryl Clatworthy is shutting us down tomorrow.

10/29/24 4:07:52 PM EDT

+17176291559

Tonight or tomorrow?

10/29/24 4:08:13 PM EDT

Tonight.

10/29/24 5:17:54 PM EDT

➔ 2024-10-29 08:49:46: « Randall, sorry for the delay. Literally on calls nonstop trying to close out. We are close. I need more time to respo... »

Anything more here?

10/30/24 8:03:06 AM EDT

Good morning Daryl, I assume we are not able to place cash orders today. Will you please reach out to Clatworthy and see if we can get an arrangement that will allow us to continue?

10/30/24 8:15:49 AM EDT

Daryl, our cash people just tried to order cash and they were not permitted to place orders.

10/30/24 8:15:54 AM EDT

so this is confirmed.

10/30/24 8:33:28 AM EDT

plus I need to respond to Frank Deluca's demands. How should I handle?

10/30/24 9:16:11 AM EDT

Daryl are you getting these text messages?

10/30/24 11:27:31 AM EDT

Daryl please just acknowledge that you are ok. I won't bother you any more today. Thanks.

10/30/24 9:29:40 PM EDT

Good evening Daryl I'm meeting with Sr leadership team tomorrow morning to announce Dennis leaving and talk about funding. Any updates?

10/31/24 12:06:25 AM EDT

+17176291559

Just ended a six hour conference call

10/31/24 12:06:39 AM EDT

Liked "Just ended a six hour conference call"

10/31/24 12:06:40 AM EDT

+17176291559

We're back on at 8 o'clock tomorrow morning. I'm doing everything possible.

10/31/24 12:07:32 AM EDT

Ok. Not sure how to translate that to the team

10/31/24 12:08:28 AM EDT

Anything more specific?

10/31/24 12:12:48 AM EDT (Edited 10/31/24 12:12:58 AM EDT)

Really worried about superior. Thinking I need to get a lawyer on this to be proactive

Edited

10/31/24 12:13:47 AM EDT

I will reach out to the Michigan guys and retain them personally

10/31/24 12:14:42 AM EDT

Doesn't look like we will get them paid this week.

10/31/24 12:15:21 AM EDT

Also will need to turn over Phonco locations to them.

10/31/24 12:17:35 AM EDT

I will send the data to them tomorrow unless I hear otherwise from you.

10/31/24 12:17:55 AM EDT

I will also need to notify the team.

10/31/24 12:18:21 AM EDT

+17176291559

I reached out to Krys twice today. He responded once. I asked to talk in the morning.

10/31/24 12:18:35 AM EDT

+17176291559

If we turn those locations over to them, that would be in lieu of lawsuit

10/31/24 12:19:53 AM EDT

That would be better than paying the balance of what is owed them. Should I wait till you talk to him?

10/31/24 12:20:49 AM EDT

How close are we to funding ? Later this week or is there doubt that this will get accomplished?

10/31/24 12:21:11 AM EDT

Doesn't sound like we are close

10/31/24 12:21:43 AM EDT

But I can't tell through text

10/31/24 12:22:34 AM EDT

I assume this also impacts investor payments so this will be in the news again.

10/31/24 12:25:58 AM EDT

I don't know how we can survive much longer

10/31/24 12:26:41 AM EDT (Edited 10/31/24 12:27:23 AM EDT)

We now have November customer payments coming due and we haven't paid August yet.

Edited

10/31/24 12:29:43 AM EDT

By the way Ray Davis deal is off if we don't pay \$300k by Friday. He is going to take revenue from us.

10/31/24 12:32:51 AM EDT

I need something positive to tell the team. They are all going to freak out when investors aren't paid

10/31/24 12:33:25 AM EDT

Everyone has been waiting for this. Partners included.

10/31/24 12:34:29 AM EDT

Anything?

10/31/24 12:36:35 AM EDT

Please 🙏

10/31/24 12:38:01 AM EDT

Is this the end of paramount and heller capital?

10/31/24 12:41:04 AM EDT

Daryl?

10/31/24 12:45:37 AM EDT

Please talk to me.

10/31/24 5:22:00 AM EDT

Are you awake?

10/31/24 5:22:13 AM EDT

I need to talk to you please

10/31/24 6:12:52 AM EDT

I need to know — likelihood of securing enough funding to pay investors and take care of PMG liquidity needs and best and worst case scenario for timing please.

10/31/24 6:13:29 AM EDT

because the shit is going to hit the fan today/tomorrow and I don't want to read about it in the newspaper.

10/31/24 6:15:52 AM EDT

I'm going to call you at 6:30 this morning as I need answers please.

10/31/24 6:17:27 AM EDT

our communication provider is threatening to shut off all of our modems if they don't receive \$100k now.

10/31/24 6:19:12 AM EDT

this means that most of our ATMs will stop operating

10/31/24 7:01:46 AM EDT

Sorry to go all "Tommy and Joe" on you here but ignoring my questions isn't fair. If we aren't getting funding then you and I need to strategize on actions we should be taking now — bankruptcy, laying off employees etc. but waiting until vendors shut us off and the company dies as a result is not the solution

10/31/24 7:05:40 AM EDT

+17176291559

Did not see your messages last night as I was closing other issues. Back on 7 AM get to you. What time is your exact call?

10/31/24 7:06:48 AM EDT

9:30 am. Can you be on the call and talk to everyone?

10/31/24 7:07:16 AM EDT

Just senior leadership team.

10/31/24 7:19:34 AM EDT

On Monday, you said timing of funding was today, tomorrow or Monday. Is that still the case?

10/31/24 8:11:13 AM EDT

Also we need cash for beach house mortgage.

10/31/24 8:25:47 AM EDT

From Devin — our legal counsel regarding Ray Davis

10/31/24 8:25:49 AM EDT

Daryl and Randall,

Today I received the attached email from Davis's counsel demanding that the Stipulation of Settlement be signed and the first scheduled payment of \$300,000 be delivered by Friday, November 1st or the settlement will be off the table and Davis's counsel will proceed with the Article 9 remedies of collecting from Sharenet's customers directly and pursuing the sale of Sharenet's property.

If you still want to move forward on the negotiated terms, I need ASAP both Daryl's signature on the attached document and payment of \$300,000 via wire transfer to the account noted in paragraph 4 of the stipulation by Friday.

I'm working to get a DocuSign version of the document and will forward that around as well if it is easier.

Thank you,

Devin

10/31/24 8:26:07 AM EDT

How should I respond?

10/31/24 8:30:30 AM EDT

I meet sr. leadership team on a call in one hour. I need to know how to respond to funding status.

10/31/24 8:30:32 AM EDT

please

10/31/24 8:30:49 AM EDT

would like you to join if at all possible to discuss.

10/31/24 9:04:40 AM EDT

Daryl, 25 minutes to my SLT meeting

10/31/24 9:15:15 AM EDT

15 minutes until the SLT

10/31/24 9:25:08 AM EDT

5 minutes to SLT

10/31/24 9:25:15 AM EDT

anything?

10/31/24 9:25:20 AM EDT

can you join?

10/31/24 9:26:11 AM EDT

hello?

10/31/24 9:42:10 AM EDT

had meeting and told everyone that i was looking for an update from you and that you were tied up in funding meetings that as soon as I heard from you, I would let them know the status.

10/31/24 9:43:04 AM EDT

Dennis announcement is out in the public.

10/31/24 12:01:35 PM EDT

Please see Torosian email.

10/31/24 3:19:41 PM EDT

payments going out to investors today?



10/31/24 5:51:19 PM EDT

+17176291559

We have been pushing them for days. They were over a week late in getting us the APA. They inserted new concepts last night and today. We turn documents within minutes or hours. Took them days to agree to the indemnities and releases. 100% on them for not having this signed. We have waited up to a day to get turns from them at time and as recent as this week.

10/31/24 5:52:35 PM EDT

Is this for the release that they need to sign?

10/31/24 5:53:36 PM EDT

Do you actually have the cash lined up to pay them? If I knew that I would feel a lot better

10/31/24 5:54:18 PM EDT

Evan said it's all over Reddit

10/31/24 5:54:47 PM EDT

+17176291559

What's over Reddit?

10/31/24 5:54:52 PM EDT

+17176291559

This is their issue, not mine

10/31/24 5:55:02 PM EDT

That they're not getting money and now they have documents they need to sign

10/31/24 5:55:11 PM EDT

Some people are seeing it as a stall tactic on your part

10/31/24 5:55:24 PM EDT

+17176291559

They have released documents. We don't have a move in. But the real issue was the fun managers.

10/31/24 5:56:49 PM EDT

Do you have cash to pay them if they get releases back to you?

10/31/24 5:57:29 PM EDT

+17176291559

Private equity coming to take them out

10/31/24 5:57:48 PM EDT

+17176291559

Putting some of my cannabis dock as well

10/31/24 6:00:09 PM EDT

What is your expectation for my payment?

10/31/24 6:22:11 PM EDT

Also we are going to need cash at PMG tomorrow. Any available?

10/31/24 6:23:27 PM EDT

+17176291559

➔ Replying to you, 2024-10-31 18:00:09: « What is your expectation for my payment? »

Hoping within days

10/31/24 6:23:42 PM EDT

+17176291559

➔ Replying to you, 2024-10-31 18:22:11: « Also we are going to need cash at PMG tomorrow. Any available? »

Possibly. Just reserve the cash until this closes.

10/31/24 6:23:51 PM EDT

Trying to

10/31/24 6:24:08 PM EDT

➔ Replying to you, 2024-10-31 18:00:09: « What is your expectation for my payment? »

Reacted 🤔 to "Hoping within days "

10/31/24 6:25:48 PM EDT

You holding up ok?

10/31/24 6:26:07 PM EDT

I can't imagine what you must be going through

10/31/24 9:17:58 PM EDT

when you talk to superior, tell the I am no longer an owner either like Dennis. We will have stock purchase agreement from you reflect that you purchased all of my stock as of Monday this week and the payments are based on the dates you and I agreed.

11/1/24 8:40:00 AM EDT

can you transfer \$350k to us today?

11/1/24 8:40:26 AM EDT

acquisition partners are pounding me for their payments

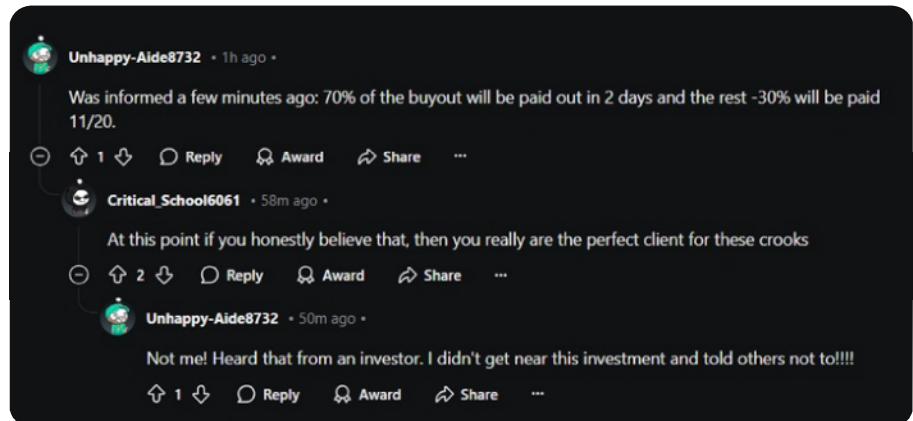
11/1/24 8:40:54 AM EDT

plus we critical vendor payments

11/1/24 8:49:38 AM EDT

Daryl?

11/1/24 9:02:38 AM EDT



11/1/24 9:02:43 AM EDT

in reddit.

Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.  
net, +17179175670, randall.leanman@paramountmgrp.com, +17179172753

11/1/24 11:53:14 AM EDT

Daryl we need cash please

11/1/24 1:01:41 PM EDT

Randall,

Davis's counsel has asked that you sign the settlement agreement for Paramount and cross out the November 1st date in paragraph 3(a) and add November 6th, instead. They will then initial over your changes to indicate their assent to the extension.

Frankly, I'm not sure what they will do between now and Wednesday if we do not honor their request. There certainly remains the risk that, until we have have a fully executed agreement, Davis could renege and instead exercise his Article 9 rights as to Sharenet's customers/creditors and collateral. But if payment is forthcoming, I suspect they would rather have the payment.

If you'd like to honor their request, I've attached the agreement with your name in the signature block.

Devin

11/1/24 1:03:41 PM EDT

ok to sign?

11/1/24 3:14:53 PM EDT

**More on SHARENET**

Randall,

See below, as expected they are threatening to pull the negotiated settlement and resume the Article 9 process if the Settlement Stipulation is not signed today. You should be receiving momentarily a DocuSign of the Stipulation (edited to bump the initial payment to November 6th) from our office.

Devin

11/1/24 3:22:26 PM EDT

+17176291559

Confirmed

11/2/24 8:57:06 AM EDT

Amish and Mennonite investors among those awaiting buyout payments from Lancaster-based ATM network

CHAD UMBLE | Staff Writer

Published Sat Nov 02, 2024 5:00 AM EDT

As investors in a Lancaster County-based ATM network struggle to recoup their funds, it has become clear that the network's offerings were particularly appealing to Amish and Mennonite residents here and across the region.

Key executives in managing and marketing the network have long and deep ties to both communities, and ATMs have a stronger than average connection to both groups.

The ties start with the man managing the network, and who had developed a track record locally of success in business — Daryl Heller. Heller is a lifelong Lancaster County resident who attended local Mennonite schools and is the son and grandson of Mennonite pastors. Heller's right hand man for many years in marketing the network to individual investors, Dave Zook, has Amish connections. He grew up in an Amish family near Atglen, and became a chief promoter of Heller's ATM investment after making his own investment with him in 2012. Zook remains a major investor. As a manager of some of the funds in the network, Zook also has been helping lead the effort to get the investors money back.

READ: Investors in Lancaster-based ATM network still awaiting payment after latest deadline passes

Investors who contacted LNP | LancasterOnline said there were many people from Plain Sect communities - Amish and Mennonite - among the 2,700-some investors in the ATM network. Exactly how many is unclear. However, all of those tipsters, including some with Amish and Mennonite backgrounds, said they wrote their own checks to invest in the network not because they studied the financials of getting income from ATMs, but because of the reputation of the people making the pitch and the fact that they knew others who were doing it.

Zook declined to comment for this story. Heller did not respond to questions about the number of Plain Sect investors in his ATM network. It's who you know

Steve Nolt, director of the Young Center for Anabaptist and Pietistic Studies at Elizabethtown College, said such personal connections take on greater weight when members of Plain Sect churches make financial decisions.

"In a 'high context culture,' who you know and how you're known are important credentials. That's not an inherently bad thing, of course, but it may result in a level of trust that doesn't ask enough hard questions," Nolt said.

Historically, Nolt said any kind of investing by members of Plain Sect communities would have been frowned upon as speculation or even vaguely dishonest. Yet he said those attitudes began changing in the 1980s and 1990s when more Amish and Plain Mennonites in Lancaster and surrounding counties began moving into nonfarm jobs that left them with disposable income.

Since Plain Sect members who worked off the farm could not count on being able to sell land to fund retirement, Nolt said other investments were a way of securing money later in life.

For many Plain Sect members, multifamily real estate is a natural place to begin investing. For people looking for another option, Nolt said an

ATM investment could have some inherent appeal, especially since members of Plain Sect communities still often use cash to buy things. "Although Amish and Plain Mennonites don't operate on a cash-only basis – they have credit cards and so forth – they may use cash more frequently than some other Americans perhaps because they more frequently patronize some small stores that only take cash," Nolt said. Nolt said did not know the details of the ATM investments with Heller and has no evidence that there was fraud. Nevertheless, he said it illustrates a tendency amongst Plain Sect communities to sometimes put too much trust in others from their own group. "It's a reason groups like Plain Mennonites and Amish – and other tightly-knit groups for that matter – can become the targets of what criminal justice scholars call 'affinity crime,'" Nolt said.

READ: Buyout payments pushed back for investors in Lancaster-based ATM network

Affinity crimes leverage a connection to the victims to convince the victims to do things or participate in activities that are not to their benefit. Concern about church members falling victim to financial fraud prompted a group of Amish and Mennonite church leaders in 2021 to form Fraud Aware. The Ephrata-based group seeks to educate members about how to evaluate financial investments and publishes a variety of booklets that offer information, advice and cautionary tales about investments gone wrong.

"We have a very serious problem among Conservative Anabaptists. Members of our churches have lost millions of dollars through fraudulent financial activities. These losses have far-reaching effects individually, upon our Christian witness, and upon our capacity to fund the work of God's kingdom," read an introduction to one booklet, "Investment Fraud Among Us."

No one from Fraud Aware responded to a request for comment for this story.

11/2/24 8:58:31 AM EDT

Chad Umble is a dick

11/2/24 9:01:09 AM EDT

Implies that you and Zook are taking advantage of Amish and mennonites.

11/4/24 7:11:43 AM EST

Good morning Daryl. Any cash for Paramount today? If so how much? If not today, when? Thanks.

11/4/24 7:12:08 AM EST

Also for my payment, this week?

11/4/24 9:31:49 AM EST

➔ Replying to you, 2024-11-04 07:11:43: « Good morning Daryl. Any cash for Paramount today? If so how much? If not today, when? Thanks. »

anything on this? We are getting pounded by everyone

11/4/24 1:29:29 PM EST

From Frank DeLuca

11/4/24 1:29:31 PM EST

Daryl-

We would like to set up a call today to discuss assigning the ATM Units to Superior and avoid having to file a motion with the court to turn over possession of the ATM units/appoint a receiver. Please let me know when we can set up the call.

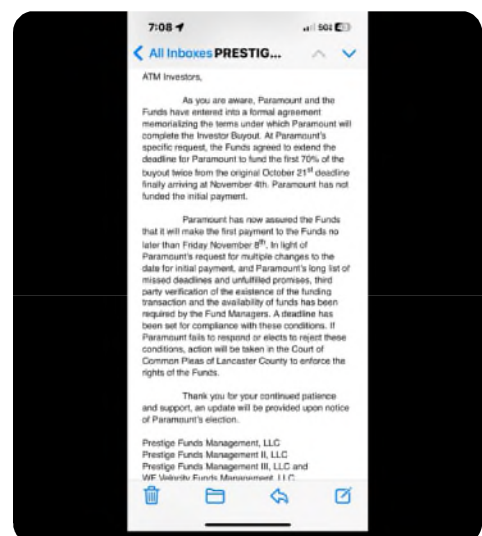
Thanks,

Frank  
Frank M. DeLuca, Atty.  
1615 S. Telegraph Rd | Suite 400 | Bloomfield Hills MI 48302  
P: 248-763-8765

Text message  
11/4/24 11:26:35 PM EST

FYI

11/4/24 11:26:40 PM EST



iMessage  
11/5/24 7:09:05 AM EST

FYI DLA Piper wants paid about \$72k for invoices

11/5/24 7:11:25 AM EST

+17176291559

That email with misrepresents. I'll get back to you.

11/5/24 7:12:37 AM EST

Understood. Just worried sick right now that this won't go through.

11/5/24 7:15:23 AM EST

By the way this email was posted to Reddit

11/5/24 7:21:53 AM EST

I realize you can't give assurances at 100% but is closing occurring on Thursday and funding Friday?

11/5/24 7:44:29 AM EST

Am I to assume your lack of response means that we won't get funded this week?

11/5/24 8:03:58 AM EST

I guess I am. We are all fucked.

11/5/24 8:07:09 AM EST

+17176291559

And I'm literally on with legal. We are not fucked.

11/5/24 8:07:58 AM EST

Feels like that to me

11/5/24 8:12:22 AM EST

Do you have enough funding lined up and it's just a matter of time until we get it?

11/5/24 8:13:49 AM EST

i just lost \$86k to Superior



11/5/24 9:32:52 AM EST

Will you at least please give me an update on where we are so I have some kind of an idea

11/5/24 11:00:16 AM EST

Daryl I deserve a response please

11/5/24 11:44:36 AM EST

Please call me. I need to speak with you

11/5/24 11:54:46 AM EST

+17176291559

Sent this to a few people hitting me early this morning

**\*\*This is confidential and do not send to anyone\*\***

These guys continue to play games with me and setting me up for failure by sending email Saturday night to investors establishing expectations on Monday funding and then refused to correct the email upon my request when I found out what they had done. In fact, I told them clearly and adamantly on text Saturday five hours before they sent the email that Monday date cannot be used. The APA and the release documents were held up by them, not me for days/week. They're now trying to say they caught us on a "technicality" because the date we had on APA when we were expecting to sign it Thursday evening was November 4 and we failed to change date to November 6/7 when we signed it Saturday afternoon. Simple oversight as everyone was rushing to sign it Saturday afternoon. The only reason we didn't sign apa Thursday night (or even Friday) is because Jerry was refusing to sign off on his release of liability and did not sign off on it until Saturday which finally releases his lawsuits, claims, liability. I've told Billy multiple times that the upon the APA being signed it will go to the debt and equity buyers/partners and they will tell us when they will fund.

The fact that the APA was signed on a weekend, funds take a couple days to assemble and only after being approved and implemented by all parties Monday/Tuesday. Moreover, wires, if any are off shore as one player is in Europe can take days. Being in banking, Billy knows that intimately. Sending that when I told them not to send that date was setting us up for failure and intentional action to continue to try to harm reputation and manipulate the narrative and simply disingenuous email Saturday evening as I told them exact opposite five hours earlier and not to send that dates.

Regretfully, the buyers/partners now have the letter in their hands from last evening threatening the lawsuit again so just makes my job that much more difficult.

Here is the email we sent to their legal Sunday trying to show deference, respect and professionalism but seemingly our actions are met with opposite behavior. They ignored the email.

From: Matthew Roazen <matthew@weintraublawgroup.com>  
Sent: Sunday, November 3, 2024 6:10 PM  
To: Rory Connaughton <roryc@bcgl-law.com>; Ted Brubaker <tedb@bcgl-law.com>  
Cc: Richard Weintraub <rick@weintraublawgroup.com>; Daryl Heller <dheller@hellercg.com>  
Subject: Re: INVESTOR STATUS REPORT -- Draft for Sunday 3 November 2024

Dear Rory and Ted:

On behalf of Daryl Heller and Heller Capital Group LLC, as Paramount Released Parties, this is to confirm conversations today with or on behalf of Daryl Heller and with counsel and representatives for the Fund Managers and/or the Funds with respect to the Asset Sale Agreement which was finally executed yesterday, November 2, 2024 at 2 pm EDT:

1. Although the ASA and other documents are dated November 1, 2024, they were not finally countersigned by Paramount Management Group (PMG) until a settlement agreement between Jerry Hostetter and Daryl Heller, which was a known precondition to signature of the ASA, was signed on November 2.
2. As the Fund Managers and the Funds are aware, it was a precondition to any agreement between PMG and its funders with respect to the purchase prices in the ASA that an executed ASA be presented to such funders before the Closing Payment under Section 3 (a) is transmitted to the Fund Managers.
3. The Fund Managers were made aware as early as the 31st of October that at least one of PMG's funders is based in Europe. Significant dollar amounts of international wires from outside the United States into the United States can take several business days to effect.
4. Due to the delay in receiving Jerry Hostetter's signed release until Saturday, the ASA was not closed until the weekend.
5. November 4, 2024 is a Monday. As soon as offices in the relevant cities open for business on that day, PMG will be using all resources at its disposal to coordinate final approvals of APA and associated wires from the funders to the Fund Managers in accordance with Section 3(a) of the ASA. However, given that these wires will be eight to nine figures, and given that one wire will be coming from outside the United States through the international banking system, it can take several business days to organize, approve, and transmit a wire transfer. The wires themselves could take at least one or several days to clear the banking system.
6. It is for the above reasons that yesterday, November 2, 2024, after the documents were executed, representatives of the Funds and Fund Managers, and representatives of PMG, discussed the text of an email to be sent to the ATM Owners who are the Members of the Funds. The purpose of this email was for the Fund Manager to inform the

Members of progress of negotiations. It is important to note that on the previous day, November 1, 2024, the parties also agreed an earlier email to update Members, and that no email was sent until Paramount's representative agreed its contents. Although Daryl Heller specifically requested that he approve the contents of the November 2, 2024 email, a message was proposed around 3:13 pm by group text that suggested a hard deadline of November 4, 2024 for "funding" of the first installment. At 3:23, Daryl advised the group as follows: "We absolutely need to keep the date open as you did in the first communication Thursday night [referring to the Fund Managers' representative's understanding of the organization and timing issues of the wires as discussed in 2-5 above]. Signed APA will be sent out within an hour to all players and will get the funding date back. It [is] likely to be Tuesday" (for confirmation of exact date)

7. At some point between 3:13 and 5:20 pm on Saturday, November 2, 2024, an email was sent out to ATM Owners that contained the following representation: "The initial installment, representing 70% of the total buyout is due on Monday, November 4th." Not only was this sent out without Paramount's approval, it also contains an even stronger undertaking than what was originally proposed to Mr. Heller.

8. Beginning at some point in the morning of Sunday, November 3, 2024, certain ATM owners and members of the media have reached out to Mr. Heller to confirm or discuss the terms of the email sent on Saturday evening.

9. In response to Mr. Heller's concerns that the deadline offered in this email raises a legal and reputational expectation on Paramount that the Fund Managers understand is unrealistic, counsel and representatives of the Funds and the Fund Managers have confirmed as follows:

- They understand that PMG is working with its funders to confirm a funding date, that these dates will not be confirmed until the 4th of November, and that the actual transmission of the Closing Payment may not finally arrive to the Fund Managers for a day or two after that.
- The Funds and Fund Managers will not, therefore, call PMG into default of the ASA or litigation stipulations on the 5th of November simply because the Closing Payment has not arrived.
- Mr. Heller, having transferred control of Prestige Investment Group (PIG) to Jerry Hostetter, does not have the right to communicate directly to Members on behalf of the Fund Managers, who are owned and controlled by PIG.

10. Therefore, because PMG and Mr. Heller on its behalf are precluded from communicating directly with the Funds other than through the Fund Managers, and because Mr. Heller is receiving regular inquiries from the Fund Members, PMG has been asking the Fund Managers to update the Members that a reliable date for receipt of the Closing Payment is expected from PMG's funders on Monday, November 4, 2024 and will be distributed to the ATM Members when such date is communicated to PMG. PMG respectfully requests that such update be transmitted as soon as possible.

Matthew Roazen  
Corporate Counsel

Cell: 646-920-2000  
Email: matthew@weintraublawgroup.com (mailto:  
matthew@weintraublawgroup.com)

11/5/24 11:55:29 AM EST

is there something missing here?

11/5/24 11:55:33 AM EST

more text?

11/5/24 11:55:45 AM EST

+17176291559

You have to click on it to open it

11/5/24 11:55:52 AM EST

nothing to click

11/5/24 11:56:08 AM EST

+17176291559

**\*\*This is confidential and do not send to anyone\*\***

These guys continue to play games with me and setting me up for failure by sending email Saturday night to investors establishing expectations on Monday funding and then refused to correct the email upon my request when I found out what they had done. In fact, I told them clearly and adamantly on text Saturday five hours before they sent the email that Monday date cannot be used. The APA and the release documents were held up by them, not me for days/week. They're now trying to say they caught us on a "technicality" because the date we had on APA when we were expecting to sign it Thursday evening was November 4 and we failed to change date to November 6/7 when we signed it Saturday afternoon. Simple oversight as everyone was rushing to sign it Saturday afternoon. The only reason we didn't sign apa Thursday night (or even Friday) is because Jerry was refusing to sign off on his release of liability and did not sign off on it until Saturday which finally releases his lawsuits, claims, liability. I've told Billy multiple times that the upon the APA being signed it will go to the debt and equity buyers/partners and they will tell us when they will fund.

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Dear Rory and Ted:

On behalf of Daryl Heller and Heller Capital Group LLC, as Paramount Released Parties, this is to confirm conversations today with or on behalf of Daryl Heller and with counsel and representatives for the Fund Managers and/or the Funds with respect to the Asset Sale Agreement which was finally executed yesterday, November 2, 2024 at 2 pm EDT:

1. Although the ASA and other documents are dated November 1, 2024, they were not finally countersigned by Paramount Management Group (PMG) until a settlement agreement between Jerry Hostetter and Daryl Heller, which was a known precondition to signature of the ASA, was signed on November 2.
2. As the Fund Managers and the Funds are aware, it was a precondition to any agreement between PMG and its funders with respect to the purchase prices in the ASA that an executed ASA be presented to such funders before the Closing Payment under Section 3 (a) is transmitted to the Fund Managers.
3. The Fund Managers were made aware as early as the 31st of October that at least one of PMG's funders is based in Europe. Significant dollar amounts of international wires from outside the United States into the United States can take several business days to effect.
4. Due to the delay in receiving Jerry Hostetter's signed release until Saturday, the ASA was not closed until the weekend.
5. November 4, 2024 is a Monday. As soon as offices in the relevant cities open for business on that day, PMG will be using all resources at its disposal to coordinate final approvals of APA and associated wires from the funders to the Fund Managers in accordance with Section 3(a) of the ASA. However, given that these wires will be eight to nine figures, and given that one wire will be coming from outside the United States through the international banking system, it can take several business days to organize, approve, and transmit a wire transfer. The wires

themselves could take at least one or several days to clear the banking system.

6. It is for the above reasons that yesterday, November 2, 2024, after the documents were executed, representatives of the Funds and Fund Managers, and representatives of PMG, discussed the text of an email to be sent to the ATM Owners who are the Members of the Funds. The purpose of this email was for the Fund Manager to inform the Members of progress of negotiations. It is important to note that on the previous day, November 1, 2024, the parties also agreed an earlier email to update Members, and that no email was sent until Paramount's representative agreed its contents. Although Daryl Heller specifically requested that he approve the contents of the November 2, 2024 email, a message was proposed around 3:13 pm by group text that suggested a hard deadline of November 4, 2024 for "funding" of the first installment. At 3:23, Daryl advised the group as follows: "We absolutely need to keep the date open as you did in the first communication Thursday night [referring to the Fund Managers' representative's understanding of the organization and timing issues of the wires as discussed in 2-5 above]. Signed APA will be sent out within an hour to all players and will get the funding date back. It [is] likely to be Tuesday" (for confirmation of exact date)

7. At some point between 3:13 and 5:20 pm on Saturday, November 2, 2024, an email was sent out to ATM Owners that contained the following representation: "The initial installment, representing 70% of the total buyout is due on Monday, November 4th." Not only was this sent out without Paramount's approval, it also contains an even stronger undertaking than what was originally proposed to Mr. Heller.

8. Beginning at some point in the morning of Sunday, November 3, 2024, certain ATM owners and members of the media have reached out to Mr. Heller to confirm or discuss the terms of the email sent on Saturday evening.

9. In response to Mr. Heller's concerns that the deadline offered in this email raises a legal and reputational expectation on Paramount that the Fund Managers understand is unrealistic, counsel and representatives of the Funds and the Fund Managers have confirmed as follows:

- They understand that PMG is working with its funders to confirm a funding date, that these dates will not be confirmed until the 4th of November, and that the actual transmission of the Closing Payment may not finally arrive to the Fund Managers for a day or two after that.
- The Funds and Fund Managers will not, therefore, call PMG into default of the ASA or litigation stipulations on the 5th of November simply because the Closing Payment has not arrived.
- Mr. Heller, having transferred control of Prestige Investment Group (PIG) to Jerry Hostetter, does not have the right to communicate directly to Members on behalf of the Fund Managers, who are owned and controlled by PIG.

10. Therefore, because PMG and Mr. Heller on its behalf are precluded from communicating directly with the Funds other than through the Fund Managers, and because Mr. Heller is receiving regular inquiries from the Fund Members, PMG has been asking the Fund Managers to update the Members that a reliable date for receipt of the Closing Payment is expected from PMG's funders on Monday,

November 4, 2024 and will be distributed to the ATM Members when such date is communicated to PMG. PMG respectfully requests that such update be transmitted as soon as possible.

Matthew Roazen  
Corporate Counsel  
Cell: 646-920-2000  
Email: matthew@weintraublawgroup.com (mailto:  
matthew@weintraublawgroup.com)

11/5/24 11:56:45 AM EST

got it.

11/5/24 12:02:33 PM EST

so are the investors backing out of the deal as a result of this?

11/5/24 12:04:05 PM EST

or is the expectation to fund Thursday/Friday still moving forward in everyone's minds?

11/5/24 12:08:28 PM EST

??

11/5/24 12:09:22 PM EST

+17176291559

No I think we are good

11/5/24 12:09:31 PM EST

+17176291559

I have not hung up the phone. I'm not ignoring you.

11/5/24 12:11:30 PM EST

ok. thanks. I feel better about this.

11/5/24 12:12:21 PM EST

what is happening with Superior. Dennis' legal counsel here is advising that we immediately, retain legal counsel and fight this.

11/5/24 12:12:45 PM EST

as I said earlier, they took \$86k from me.



Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.  
net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

11/5/24 12:16:30 PM EST

+17176291559

I will immediately get 86k back

11/5/24 12:17:18 PM EST

thanks. but this doesn't solve the larger issue

11/5/24 12:17:51 PM EST

they are going to go after more and we are still on the hook

11/5/24 12:18:04 PM EST

Dennis and I need to be released

11/5/24 12:19:06 PM EST

Daryl-

Please advise us on the status of the assignment of Superior's ATM Units and vendor contracts as we need to wrap this up ASAP. We would like to set up a call to start the process. Otherwise, I will need to file the appropriate Motion with the Court.

Thx,

Frank  
Frank M. DeLuca, Atty.  
1615 S. Telegraph Rd | Suite 400 | Bloomfield Hills MI 48302  
P: 248-763-8765

11/5/24 12:26:28 PM EST

Daryl, this is very important to Dennis and me. What are you doing about this? If nothing we will retain counsel but I don't want to do that.

11/5/24 12:33:01 PM EST

Daryl?

11/5/24 12:35:54 PM EST

+17176291559

Talking with Chris now



11/5/24 12:36:07 PM EST

+17176291559

Is Steve Gernes still with us?

11/5/24 12:36:16 PM EST

yes

11/5/24 1:10:38 PM EST

Lancaster online article

11/5/24 1:10:42 PM EST

Another missed payment deadline for investors in Lancaster-based ATM network

CHAD UMBLE | Staff Writer

Published Tue Nov 05, 2024 11:58 AM EST

After the latest deadline came and went Monday, the owner of a Lancaster-based ATM network is reportedly now saying he will make buyout payments to upset investors by Friday. But as deadlines continue to slip, the dispute over Paramount Management Group's non-payment of investor funds is inching closer to a return to Lancaster County Court of Common Pleas. The proposed buyouts by Paramount owner Daryl Heller would settle a lawsuit filed in August on behalf of roughly 2,700 investors who haven't received their promised payments since March. The lawsuit was paused in late September as the parties worked toward a settlement which had originally set Oct. 21 as the deadline for the first of two buyout payments. Two subsequent deadlines also passed without payment. In a Monday evening letter to investors, the managers of the various investment ATM funds who have been seeking repayment notified investors of the latest delay. They also describe what they say is Heller's timeline for payments while detailing some new conditions being placed on him. "Paramount has now assured the funds that it will make the first payment to the funds no later than Friday ...," the letter said. "In light of Paramount's request for multiple changes to the date for initial payment, and Paramount's long list of missed deadlines and unfulfilled promises, third party verification of the existence of the funding transaction and the availability of funds has been required by the fund managers."

11/5/24 2:03:12 PM EST

From Mike Powell

11/5/24 2:03:14 PM EST

I was told last week that all of the Margo Bitcoin ATM's across the country were shut down from operation the week before. Is that true?

11/5/24 3:32:31 PM EST

From Gierasch regarding Cypress

11/5/24 3:32:33 PM EST

Randall—Cypress's counsel is pressing Devin on a response to what has occurred with regard to the Cypress portfolio and most importantly which entity has the on-going contract obligations? We need to respond to him in the next day or 2. See below for Ben's email to you which provides that it does not appear that the Cypress obligations were assigned to CD as part of the deal Daryl struck. Is that Daryl's understanding? Was that in error?

Asking because we are reluctant to raise with Cypress's counsel that PMG sold the assets but has retained monthly payment obligations, however, if that's what it is, we will respond accordingly. Please let us know.

Stephen C. Gierasch

11/5/24 3:33:37 PM EST

They are referring to monthly GP calculation if the portfolio exceeds a certain level of business which it has done on occasion. Paramount is still responsible for this as this was not assigned to Dave Charles

11/5/24 3:49:33 PM EST

thoughts?

11/5/24 4:08:54 PM EST

thinking we ask John Barnard if he wants to buy these superior locations back and give us a check for them?

11/5/24 4:08:57 PM EST

can we do that?

11/5/24 4:09:40 PM EST

I'm concerned that splitting up the book will cause us to lose the rest if he decides he no longer wants to support us.

11/5/24 4:09:48 PM EST

or can we get Superior to buy out all of it?

11/5/24 4:10:17 PM EST

regardless, Dennis and I must move on this now.

11/5/24 4:10:26 PM EST

legally that is

11/5/24 4:23:41 PM EST

+17176291559

➔ Replying to you, 2024-11-05 16:08:54: « thinking we ask John Barnard if he wants to buy these superior locations back and give us a check for ... »

Great idea, ask him how much he would give. I'm confident we can settle the lawsuit for high 2 millions with Chris

11/5/24 4:24:56 PM EST

ok.

11/5/24 4:32:35 PM EST

thinking about the John Barnard angle — we won't be able to get this turned around quickly enough. If the asshole is not wanting to wait till Friday, there is no way I can get Barnard to write a check that quickly. We won't even be able to get docs created that fast

11/5/24 4:33:28 PM EST

can we take the angle that the asshole buys out the entire book?

11/5/24 4:33:33 PM EST

Phonco book?

11/5/24 4:34:11 PM EST

+17176291559

I don't know if he will want to do that, but he will definitely take these locations. He's been very responsive the day and we're just waiting on the revenue report.

11/5/24 4:34:25 PM EST

yes. I'm hoping to turn the report today.

11/5/24 4:34:54 PM EST

can we give him the locations and slow roll until Friday payment?

11/5/24 4:35:39 PM EST

if we give him the locations tonight, it will take a couple of days to finalize I'm sure

11/5/24 4:37:52 PM EST

regarding my stock sale — Gierasch responses in red and needs you to agree.

11/5/24 4:37:58 PM EST

Regarding the Terms, my thoughts in red below:

1. I would like this to be both HCG and Daryl personally guaranteeing Daryl?
- HCG acquiring Randall's interests in PMG, PQ and FBI such that after all transfers are concluded Randall will own 8% of each company. **Not sure I understand this math. I own 12% of each company today and not sure why I would own anything after the transfer as I'm selling 100% of my shares in each company.** Apologies—thought your initial request was to sell 1/3 of your interests in 3 increments. Will revise to be 3 equal increments so that as of March 23, 2025, you will own nothing.
- Transfer dates are 10/12/24, 11/10/24 and 1/23/26. **Agreed.**
- Total Purchase Price is \$7,100,000 and is payable in 3 equal installments on each of the transfer dates **agreed. Can we put on a 5% interest rate if these are not paid within 14 days of the due date?** Daryl?
- Total amounts to be transferred in each company: 4.63% \*\*\* This is the case because each of those companies acquired Dennis' interests so that the current ownership is: HCG - 87.37% and Randall 12.63%
- This includes mutual releases which release any potential claims up through the date of the Agreement. The only claim I have on the entities and Daryl personally is the Superior Indemnity Agreement. **Ok—so that's a stand-alone agreement that you signed with Daryl? If so, send me the date and I can carve that out of the general release (assuming Daryl is comfortable with that).**
- In terms of allocating purchase price by interest, by entity, there is a concept that HCG and Randall will do so no later than 60 days after each "transfer date"

11/5/24 4:38:18 PM EST

sorry Gierasch in BLUE

11/5/24 4:46:31 PM EST

➔ Replying to you, 2024-11-05 16:34:54: « can we give him the locations and slow roll until Friday payment? »

can we do this?

11/5/24 5:02:33 PM EST

is this an option?

11/5/24 5:35:58 PM EST

We need this ongoing margin at Paramount. Can we give him the list of locations, ask him to remove Dennis and me, then pay him on Friday and keep the locations?

11/5/24 5:36:37 PM EST

I'm already going through the employees and doing a RIF. I may have to do a lot more if this is gone

11/5/24 7:22:19 PM EST

see your email for superior contracts. I sent to you.

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

11/5/24 8:23:01 PM EST

Did you get it?

11/5/24 8:24:35 PM EST

+17176291559

I'm causing remote with legal. Can you total each month of the bottom and then the year to date? If I have that on a clean email, I think it will be suffice.

11/5/24 8:25:05 PM EST

Yes.

11/5/24 8:28:31 PM EST

in your inbox now.

11/5/24 8:29:55 PM EST

how is it going with legal? we still on for Friday funding?

11/5/24 8:32:05 PM EST

+17176291559

What is a direct pay commission?

11/5/24 8:33:09 PM EST

This is what is paid by processor. We don't have data on checks as this is done by Barnards team and never integrated it into our system

11/5/24 8:33:52 PM EST

So this is not a complete picture of merchant payments.

11/6/24 7:36:42 AM EST

Good morning Daryl, are you able to bring in any cash to PMG today?

11/6/24 7:37:39 AM EST

+17176291559

I'm working on getting all this closed out.

Right now, my top priority is investor settlement and superior lawsuit resolved. I've already reached out to Krys this morning. I'm hopeful to get this completely terminated.

11/6/24 7:37:55 AM EST

Loved "I'm working on getting all this closed out.  
Righ..."

11/6/24 7:44:50 AM EST

any thoughts on us moving to North Queen office?

11/6/24 7:44:57 AM EST

we need to start planning now.

11/6/24 7:57:20 AM EST

Regarding my stock purchase by you, can we add 5% interest if not paid within 30 days of due date? Also, can we add you as personal guarantor in addition to HCG?

11/6/24 9:40:33 AM EST

Sharenet — from our counsel — Daryl and Randall,

A reminder that the initial \$300,000 settlement payment from Sharenet to Ray Davis is due today. The wire instructions are contained at paragraph 4 of the attached Stipulation.

-Devin

11/6/24 10:40:19 AM EST

I responded and told them it would be Friday with payment Monday

11/6/24 5:48:13 PM EST

Closing tomorrow?

11/7/24 9:01:32 AM EST

I'm absolutely tripping over this lack of information from you on what's happening with investor closing. The only way I know how to interpret your silence is that either 1. you don't have funding lined up in which case we are completely fucked or 2. you do have it but it is delayed for some reason. I am I am at the end of my rope on this.

11/7/24 10:24:36 AM EST

+17176291559

Randall, I'm not ignoring you. As you saw in the paper and as they know, the payment is supposed to be early next week. I can sign all your documents on the sale today if we can just get them into DocuSign.

11/7/24 10:25:41 AM EST

Daryl, I know it's supposed to be early next week but I just don't feel any confidence that it all actually occur. That's what I'm really worried about.

11/7/24 10:26:02 AM EST

➔ Replying to you, 2024-11-06 07:57:20: « Regarding my stock purchase by you, can we add 5% interest if not paid within 30 days of due date? Als... »

Gierasch wants you to agree to these two things that I added into his document

11/7/24 10:26:29 AM EST

➔ Replying to you, 2024-11-07 10:25:41: « Daryl, I know it's supposed to be early next week but I just don't feel any confidence that it all... »

I just need to know that we are going to be OK. I am worried sick.

11/7/24 10:26:44 AM EST

Do you have the funding lined up?

11/7/24 10:27:54 AM EST

This is the one question you won't answer and is driving me absolutely bat shit crazy

11/7/24 11:00:46 AM EST

why won't you answer this?

11/7/24 11:18:10 AM EST

I can't do this anymore.

11/7/24 11:19:49 AM EST

+17176291559

Randall, I'm sorry. I'm trying to be 100% definitive before I let you down again. we are currently looking to fund on Tuesday and starting to work with a fun managers on such

11/7/24 11:19:59 AM EST

+17176291559

My phone blows up and I try to get to you and only a couple others

11/7/24 11:20:07 AM EST

+17176291559

I'm sorry for my delays

11/7/24 11:20:57 AM EST

Do you have enough money lined up to pay everyone?

11/7/24 11:23:46 AM EST

Did the investors verify that you have the funds needed as the article said?

11/7/24 11:36:57 AM EST

I guess the answer is "no"

11/7/24 11:38:56 AM EST

+17176291559

That's what we been given him the last 24. I remain hopeful.

11/7/24 11:39:46 AM EST

I don't understand what you mean here

11/7/24 11:40:18 AM EST

hopeful for what?

11/7/24 11:41:49 AM EST

if you don't have enough money lined up to pay the investors, then I'm not sure what you are hopeful for?

11/7/24 11:47:52 AM EST

This is a pretty simple question with a fairly simple response I believe. The fact that you can't answer it tells me all that I need to know.



11/7/24 12:13:19 PM EST

So we don't have enough money. Investors go back to court. Paramount files for bankruptcy then the real court battles begin and I'm in the middle of it.

11/7/24 12:18:05 PM EST

Please tell me why my perspective is incorrect

11/7/24 12:40:10 PM EST

Please call me

11/7/24 12:49:28 PM EST

+17176291559

We are not going back to court. They will be paid. I'm literally on w legal and them trying to complete. Or Alternatively, we could just turn the locations over to them, but don't want to do that.

If we can, we will.. We have a total reset plan being implemented which is very positive.

Also, send me your docs for the buyout dates next week. I want to give you the security. Rose can turn into DocuSign.

11/7/24 12:51:16 PM EST

➔ Replying to you, 2024-11-06 07:57:20: « Regarding my stock purchase by you, can we add 5% interest if not paid within 30 days of due date? Als... »

Gierasch needs you to agree to these terms do you agree to them or would you like something else?

11/7/24 12:59:31 PM EST

Do you agree to these changes or not?

11/7/24 1:03:50 PM EST

+17176291559

Yes, to all three

11/7/24 1:21:34 PM EST

thanks

Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgrp.com, +17179172753

11/7/24 1:25:43 PM EST

Here is what is in the agreement. How would you like to adjust the dates?

11/7/24 1:25:48 PM EST

Stock Sale Date	Amount	Percent
10/31/24	\$ 2,367,000	4%
11/30/24	\$ 2,367,000	4%
3/23/25	\$ 2,366,000	4%
	\$ 7,100,000	12%

11/7/24 1:37:58 PM EST

also, how do you want to handle beach house mortgage?

11/7/24 2:05:48 PM EST

Questioned an image

11/7/24 3:02:55 PM EST

Daryl, you ok with these dates or should I change?

11/7/24 5:50:34 PM EST (Edited 11/7/24 5:50:47 PM EST)

You OK if I pass on the Margo space would you prefer that we take it? Just trying to cut out that rent.

Edited

11/7/24 8:47:09 PM EST

➔ Replying to you, 2024-11-07 13:25:48: (Image)

You ok with these dates or do you want to change?

11/7/24 8:47:55 PM EST

+17176291559

➔ Replying to you, 2024-11-07 13:25:48: (Image)

Make it 1115, 1215 and 315

11/7/24 8:48:04 PM EST

Ok

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

11/7/24 8:51:28 PM EST

➔ Replying to you, 2024-11-07 13:37:58: « also, how do you want to handle beach house mortgage? »

Any thoughts on this?

11/7/24 8:55:36 PM EST

I'm ok with whatever even if you want to sell it.

11/7/24 8:55:49 PM EST

I will get something else down there.

11/7/24 8:56:16 PM EST

Happy to stay in the partnership but need to plan for this mortgage

11/8/24 11:12:05 AM EST

any of these company names jump out to you to rebrand Paramount? I would like to do this in conjunction with moving to new offices.

11/8/24 11:12:10 AM EST

**Cashé**

**Cashere**

**Monét**

**NewCash**

**FiQ**

53

**Concier**

52

**Omni FI**

50

**Omney**

46

**Power FI**

45

**Crown FI**

11/8/24 12:04:16 PM EST

I'm partial to Omney.

11/8/24 12:05:48 PM EST

+17176291559

➔ Replying to you, 2024-11-07 13:37:58: « also, how do you want to handle beach house mortgage? »

Are you saying there's an outstanding payment right now? I can get it paid.

11/8/24 12:05:58 PM EST

No.

11/8/24 12:06:29 PM EST

when you buy my stock — how do you want to handle the beach house mortgage payment?

11/8/24 12:06:35 PM EST

moving forward

11/8/24 12:12:11 PM EST

Are we paying off the mortgage or keeping it going?

11/8/24 12:12:43 PM EST

If we are keeping it going, I need to kick in 30% per month toward it and just need to plan cash accordingly

11/8/24 12:13:00 PM EST

I'd prefer to pay it off so that I don't have to pay monthly because I don't want that additional burden

11/8/24 3:58:29 PM EST

LNP | LancasterOnline: Owner of Lancaster-based ATM network owes more than \$25M to creditors, IRS

11/8/24 3:58:30 PM EST

[https://lancasteronline.com/business/local\\_business/owner-of-lancaster-based-atm-network-owes-more-than-25m-to-creditors-irs/article\\_104830a4-9e02-11ef-a86b-d39857777fbb.html](https://lancasteronline.com/business/local_business/owner-of-lancaster-based-atm-network-owes-more-than-25m-to-creditors-irs/article_104830a4-9e02-11ef-a86b-d39857777fbb.html)

11/8/24 3:58:31 PM EST

Owner of Lancaster-based ATM network owes more than \$25M to creditors, IRS

11/8/24 3:59:25 PM EST

This Chad Umble has it out for you.

11/8/24 4:26:24 PM EST

+17176291559

Crazy

11/8/24 4:26:41 PM EST

Sorry, man, you don't deserve that

11/10/24 10:25:01 AM EST

Daryl

Just a few words to let you know that in spite of the pain that we are experiencing today, I am looking forward to what is next together. After this is behind us and you've had a chance to recover and regroup, I look forward to a postmortem evaluation and creating a new future together. What has occurred to you/us/me and our families strengthens my resolve to build a successful organization that benefits all who are associated with it. Thanks for all that you are doing to battle through this time and I hope that you and your family are able to work through this shit in a way they makes you all stronger together.

11/10/24 12:06:29 PM EST

+17176291559

Loved "Daryl

Just a few words to let you know that in sp..."

11/10/24 12:06:52 PM EST

+17176291559

Needed that, thank you. I'm driving for quite a few hours, but I have some positive words for you as well.

11/10/24 12:07:19 PM EST

Loved "Needed that, thank you. I'm driving for quite a fe..."

11/11/24 7:41:27 AM EST

Good morning Daryl. Hope you had a nice weekend. Realize the banks are closed today. What is your expectation for incoming cash? We will need cash to make payroll this week.

11/11/24 7:42:03 AM EST

Also still on track for my personal payment on Friday? I need to need to plan for this. Thanks.

11/11/24 8:43:47 AM EST

also, would like to know your thoughts on how you want to handle the beach house mortgage moving forward so I know how to plan. Thanks

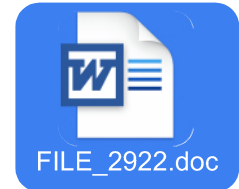
11/11/24 9:41:15 AM EST

We are OK with whatever you want to do here with the beach house mortgage moving forward

11/11/24 10:50:12 AM EST

Daryl , any responses here?

11/11/24 11:25:10 AM EST



11/11/24 11:25:46 AM EST

This is my stock purchase agreement. If you are good with this I will ask Rose to set up for docusign

11/11/24 3:54:49 PM EST

Daryl?

11/11/24 3:58:41 PM EST

Everything ok?

11/11/24 3:58:46 PM EST

+17176291559

Yes I am good with it

11/11/24 3:58:58 PM EST

Ok

11/11/24 3:59:01 PM EST

+17176291559

➔ Replying to you, 2024-11-11 08:43:47: « also, would like to know your thoughts on how you want to handle the beach house mortgage moving forwa... »

Right now it's not part of your buyout, correct?

11/11/24 3:59:09 PM EST

Correct

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.  
net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

11/11/24 3:59:23 PM EST

+17176291559

➔ Replying to you, 2024-11-11 07:41:27: « Good morning Daryl. Hope you had a nice weekend. Realize the banks are closed today. What is your ex... »

I sent 200 K to JBT on Friday

11/11/24 3:59:32 PM EST

➔ Replying to you, 2024-11-11 07:41:27: « Good morning Daryl. Hope you had a nice weekend. Realize the banks are closed today. What is your ex... »

Liked "I sent 200 K to JBT on Friday"

11/11/24 3:59:57 PM EST

+17176291559

With Cypress gone and some of this other stuff, can we bring down our headcount? What is total headcount right now?

11/11/24 4:00:15 PM EST

Yes. I have about 10 people on the list.

11/11/24 4:00:24 PM EST

Maybe more. By end of year

11/11/24 4:00:34 PM EST

Beginning of new year

11/11/24 4:00:49 PM EST

We are already down about 7

11/11/24 4:01:12 PM EST

I have a path to \$300k in margin improvements

11/11/24 4:01:15 PM EST

Per month

11/11/24 4:01:31 PM EST

➔ Replying to you, 2024-11-11 07:42:03: « Also still on track for my personal payment on Friday? I need to need to plan for this. Thanks. »

What about this?

11/11/24 4:05:43 PM EST

??

11/11/24 4:07:44 PM EST

➔ Replying to you, 2024-11-11 08:43:47: « also, would like to know your thoughts on how you want to handle the beach house mortgage moving forwa... »

We are willing to do whatever

11/11/24 4:13:04 PM EST

Anything here on these two topics?

11/11/24 5:22:47 PM EST

Anything?

11/11/24 6:54:55 PM EST

+17176291559

On calls right now regarding such. Hang tight.

11/11/24 8:17:56 PM EST

Ok. Is the investor payout/program completed?

11/12/24 6:56:18 AM EST

➔ 2024-11-11 18:54:55: « On calls right now regarding such. Hang tight. »

Any update here?

11/12/24 6:56:28 AM EST

➔ 2024-11-11 18:54:55: « On calls right now regarding such. Hang tight. »

Good morning by the way. 😊



11/12/24 8:46:30 AM EST

any chance we can get \$1.3M this week? need to pay off aging customer payments.

11/12/24 8:53:41 AM EST

do you know a sam lawrence? is he an investor. Someone calling sales and poking around.

11/12/24 9:55:04 AM EST

Meeting with leadership team today any update on investor program and funding?

11/12/24 9:56:13 AM EST

➔ Replying to you, 2024-11-12 08:46:30: « any chance we can get \$1.3M this week? need to pay off aging customer payments. »

Can we get 1.4m?

11/12/24 10:55:34 AM EST

+17176291559

➔ Replying to you, 2024-11-12 08:53:41: « do you know a sam lawrence? is he an investor. Someone calling sales and poking around. »

I don't, but refer him to me. What type of questions is he asking?

11/12/24 10:55:47 AM EST

+17176291559

Updates coming

11/12/24 10:57:45 AM EST

**From Sales**

➔ Replying to you, 2024-11-12 08:53:41: « do you know a sam lawrence? is he an investor. Someone calling sales and poking around. »

I think he might be an investor or someone poking around

I called him personally. He started talking about switch and \$20 surcharges.

The address he gave me for this site doesn't seem like a place for an ATM.

Wanted to see if the name rang a bell – if not I will proceed

11/12/24 10:58:10 AM EST

➔ Replying to you, 2024-11-12 08:53:41: « do you know a sam lawrence? is he an investor. Someone calling sales and poking around. »

We will let them proceed and not bother. You just wanted to make sure we weren't creating problems for you

11/12/24 2:25:14 PM EST

from Devin regarding Ray Davis

11/12/24 2:25:16 PM EST

Randall, as requested, I told Davis's counsel that Sharenet was expecting payments to go out on Monday. They responded today, below. Please provide any additional update or information that I am authorized to share with Davis's counsel. Thank you,

Devin

From: Alcott, Lee <lalcott@barclaydamon.com (mailto:lalcott@barclaydamon.com)>  
Sent: Tuesday, November 12, 2024 9:26 AM  
To: Chwastyk, Devin <DChwastyk@mcneeslaw.com (mailto:DChwastyk@mcneeslaw.com)>  
Cc: Daniel Berman - Hancock & Estabrook, LLP (dberman@hancocklaw.com (mailto:dberman@hancocklaw.com)) <dberman@hancocklaw.com (mailto:dberman@hancocklaw.com)>; Dove, Jeffrey A. <JDove@barclaydamon.com (mailto:JDove@barclaydamon.com)>  
Subject: Payment [IMAN-ACTIVE.FID3179151]

[EXTERNAL]

Devin, not sure if you are aware, but no payment was received yesterday, as promised. Why?

My client will be proceeding with notice to the processors.

Please let me know if you would like to discuss.

Thank you.

Lee

Lee Alcott

Partner

11/12/24 2:50:20 PM EST

By the way we are on the verge of losing oriental bank - our best customer in Puerto Rico.

11/12/24 2:51:01 PM EST

Plus we are still not getting any revenue on the island as Nestor reprogrammed machines away from us.

11/12/24 2:51:22 PM EST

About \$80k net loss of cash to us per month.

11/12/24 2:52:31 PM EST

We owe Nestor \$300k

11/12/24 2:56:14 PM EST

We are all worried about what we are going to read in the news tonight. Are investors restarting their lawsuit?

11/12/24 3:03:27 PM EST



Superior Group ATMs, LLC Letter Received 11.12.24.pdf

11/12/24 3:03:27 PM EST

just got this in the mail at Paramount

11/12/24 4:03:47 PM EST

they are showing the full \$6M

11/12/24 4:20:22 PM EST

Will you please give me an update on the investor program?

11/12/24 8:52:21 PM EST

Hello? Really worried right now.

11/12/24 8:54:39 PM EST

+17176291559

I'm worth Matt's be Richard and their side right now. We are waiting on a release from them and expecting morning. Apologies just on calls

11/12/24 8:54:55 PM EST

What does that mean?

11/12/24 8:55:42 PM EST

+17176291559

Matt and Richard and other side.

11/12/24 8:56:00 PM EST

+17176291559

Meaning resolution. I'm driving talking and texting :)

11/12/24 8:56:00 PM EST

I don't know who they are ?

11/12/24 8:56:09 PM EST

+17176291559

My legal team

11/12/24 8:56:27 PM EST

Ok. What does the release mean?

11/12/24 8:56:53 PM EST

Is it funding tomorrow ?

11/12/24 8:58:18 PM EST

Need answers please.

11/12/24 8:58:31 PM EST

I need to know what is happening.

11/12/24 9:00:47 PM EST

I've been worried sick and everyone is wondering what is happening and I don't know how to answer them.

11/12/24 9:01:39 PM EST

+17176291559

I can send you a detailed email when I'm off the road and off these calls. The funding is going to occur. Not sure it's going to be tomorrow. We're waiting on customers bank to send the release back. They know that. They need the release as well.

11/12/24 9:02:34 PM EST

Ok. So you raised the full amount for the investors?

11/12/24 9:03:13 PM EST

And they are getting paid this week?

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

11/12/24 9:06:12 PM EST

?

11/12/24 9:08:15 PM EST

+17176291559

That is the expectation. they're now just want one payment versus two and are willing to do it Friday or Monday for one payment

11/12/24 9:08:45 PM EST

And you have the funding for it?

11/12/24 9:11:35 PM EST

?

11/12/24 9:12:10 PM EST

Yes?

11/12/24 9:12:42 PM EST

No?

11/12/24 9:14:57 PM EST

Please?

11/12/24 9:32:28 PM EST

+17176291559

Yes, I believe I'm pulling this off. I'm literally driving and talking and impossible to check texts every second so I'm not ignoring

11/12/24 9:32:48 PM EST

Ok thanks.

11/12/24 9:33:42 PM EST

My funding too?

11/12/24 9:58:24 PM EST

+17176291559

Yes

11/12/24 9:58:42 PM EST

Woo hoo!

11/13/24 5:17:10 AM EST

Why do you feel more confident that we will actually achieve this Friday/Monday funding timeframe than the previous attempts? Also we are desperate for more cash this week. We are now three months behind on customer payments. Can you send us 1.4M now?

11/13/24 7:22:01 AM EST

Good morning by the way and apologies for the early morning text. Not sleeping well these days

11/13/24 7:36:29 AM EST

➔ Replying to you, 2024-11-13 05:17:10: « Why do you feel more confident that we will actually achieve this Friday/Monday funding timeframe than... »

I need answers to this, please as this helps me deal with all of the issues and I can give explanations to people who are asking why we're not paying. Like Tommy and Joe and others

11/13/24 7:56:36 AM EST

This helps me also with Ray Davis and keeps people from reaching out to you.

11/13/24 8:21:28 AM EST

I need to speak to you for 10 minutes please. to answer these questions and so I know how to respond to legal for Cypress as well. These issues are urgent please.

11/13/24 8:23:44 AM EST

plus what is happening with Margo — I hear Austin is no longer there and much of the leadership team is gone. We are getting questions from partners on machines that are done and wondering what is happening.

11/13/24 8:27:22 AM EST

plus we just got notice of shut down of our ATM modems. They need \$100k or they are shutting us down. This is most of our fleet.

11/13/24 8:29:41 AM EST

How much GP are we trying to find for Superior? We decided to give them other terminals as we couldn't get the information they needed from the Phonco locations.

11/13/24 8:37:23 AM EST

<b>Cashé</b>	53	<b>Concier</b>
<b>Cashere</b>	52	<b>Omni FI</b>
<b>Monét</b>	50	<b>Omney</b>
<b>NewCash</b>	46	<b>Power FI</b>
<b>FiQ</b>	45	<b>Crown FI</b>

11/13/24 8:37:47 AM EST

we are going with Omney as the new company name unless I hear otherwise from you by close of business today.

11/13/24 10:52:50 AM EST

Daryl I don't understand why you are ignoring me here. Will you please respond so I know at least you are getting these text messages?

11/13/24 11:06:39 AM EST

+17176291559

Not ignoring. I have one task and that is to get thi funding behind us.

11/13/24 11:06:43 AM EST

+17176291559

Loved "we are going with Omney as the new company name un..."



11/13/24 11:07:08 AM EST

+17176291559

➔ Replying to you, 2024-11-13 08:29:41: « How much GP are we trying to find for Superior? We decided to give them other terminals as we couldn... »

How much the other 250?

11/13/24 11:07:50 AM EST

+17176291559

➔ Replying to you, 2024-11-13 08:29:41: « How much GP are we trying to find for Superior? We decided to give them other terminals as we couldn... »

I would think over 100k or 125k or 150k

11/13/24 11:12:23 AM EST

Shit, we found 76K which is what we just sent him isn't that enough?

11/13/24 11:13:29 AM EST

That's a 34 multiple of GP at \$2.6M

11/13/24 11:14:09 AM EST

Can you at least send us \$150k today so we can pay urgent customers and comms ?

11/13/24 11:26:48 AM EST

+17176291559

I'd target 100k to get this behind us. Or 90k

11/13/24 11:26:57 AM EST

Liked "I'd target 100k to get this behind us. Or 90k"

11/13/24 6:09:52 PM EST

See Torosian email

11/13/24 6:24:38 PM EST

+17176291559

I'll talk to him. I was unaware they're sending that and they're trying to walk us into numbers that were part of their initial claims which are not remotely close to accurate. We're going to get it cleaned up. Some really good progress today other than that. I'll download you after I speak to Jeff.

11/13/24 6:30:41 PM EST

Cool. Thanks. Looking forward to hearing from you.

11/13/24 7:30:14 PM EST

Are you ready to say yet if funding will be this week?

11/13/24 7:30:42 PM EST

+17176291559

They don't want it until next week. It bizarre turn of events. I'll get to you early morning.

11/13/24 7:31:20 PM EST

Ok. Just need cash at Paramount desperately

11/14/24 6:53:36 AM EST

I have sr leadership team meeting at 2 today. Can you give me an update on funding for that call? Or better yet, can you join?

11/14/24 8:12:49 AM EST

I meet with Brandon at 10 this morning don't would be important to know by then please

11/14/24 8:13:02 AM EST

Can we get any cash from you today?

11/14/24 8:13:21 AM EST

Worried that our modems are going to get shut down.

11/14/24 8:33:38 AM EST

+17176291559

Did you see the 200 K I had moved over last week?

11/14/24 8:33:51 AM EST

Yes and we used all of it.

11/14/24 8:33:58 AM EST

Urgent customer payments

11/14/24 8:34:09 AM EST

We are three months behind on customer payments

11/14/24 8:35:13 AM EST

+17176291559

The fund managers delayed the payment yesterday, not me. They don't want to litigate they want to handle it differently. As soon as we get our head around their strategy, I will respond back.

How much is the minimum to pay Uconnect? How much does Margo owe for OptConnect to us?

We not able to trim down payroll a bit ?

11/14/24 8:37:42 AM EST

the delayed payments for comms is from Kore who is our primary comms provider these days. We owe them \$50k to get the aging down.

11/14/24 8:38:27 AM EST

why would the investors delay payment? that doesn't make sense to me.

11/14/24 8:39:03 AM EST

we have already trimmed payroll since the summer by the following

11/14/24 8:39:08 AM EST

Resignation/Termination	Annual Cost w/Benefits	
Dennis	\$ 375,000	9 month severance
Kaden	\$ 81,250	
Daniel	\$ 77,500	
Chris Arruda	\$ 87,500	
Liz Forester	\$ 175,000	
Maya	\$ 313,500	9 month severance
Chuck Hammet	\$ 125,000	
Alex Wilson	\$ 123,500	
Cassandra Larson	\$ 93,750	
	\$ 1,452,000	\$ 121,000

11/14/24 8:39:18 AM EST

but Maya and Dennis have severance

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11/14/24 8:40:04 AM EST

+17176291559

The investors don't make the decision the fund managers do. They're under massive legal pressure now. Apparently firms were retained by investors to come after the fund managers and they change course yesterday. The good news is this will get resolved. The bad news is I'm not exactly sure what they're trying to do as they asked to delay, the date, not me.

11/14/24 8:40:15 AM EST

we pan to reduce head count by the following the first week of January 25

11/14/24 8:40:20 AM EST

Reduction in Force		Severance TBD
Projects (1)	\$ 75,000	Steve to determine who this is.
Terry Finberg	\$ 75,000	Leigh/Randall
Chelsea	\$ 108,750	Steve
Rimesh?	\$ 75,000	Mike/Randall
Owen	\$ 65,000	Warehouse person not needed -- Re
Jenlisa Kim	\$ 53,560	Steve
	\$ 452,310	\$ 37,693
Cash Connect TCM Labor Savings	Base Comp	
Todd Grimm	\$ 132,935	Manager
Brad Durall	\$ 101,400	Forecaster
Shanita Crosby	\$ 86,681	Forecaster
Christine Powell	\$ 121,323	Forecaster
Add Back Cash Connect TCM Fee	\$ (8,000)	
	\$ 434,339	\$ 36,194.90

11/14/24 8:40:29 AM EST

but there will be severance there as well

11/14/24 8:41:57 AM EST

so we don't get any cash until this is resolved? I am really struggling to hold all of this together.

11/14/24 8:42:39 AM EST

+17176291559

No, we will get cash before this

11/14/24 8:42:47 AM EST

ok.

11/14/24 8:43:02 AM EST

are we free to clean out the warehouse? I can save money on rent but we put a stop on clean up

11/14/24 8:43:09 AM EST

investor ATMs that is

11/14/24 8:44:48 AM EST

➔ 2024-11-14 08:42:39: « No, we will get cash before this »  
any idea when?

11/14/24 8:45:00 AM EST

and how much?

11/14/24 8:46:10 AM EST

and I assume my personal payments are tied up until the investor issue is resolved?

11/14/24 8:47:23 AM EST

I wish I could just talk to you on the phone about all of my questions.

11/14/24 8:47:44 AM EST

I feel like you are avoiding a direct conversation.

11/14/24 8:48:05 AM EST

➔ 2024-11-14 08:40:04: « The investors don't make the decision the fund managers do. They're under massive legal pressure now. Apparently f... »

could this blow up the agreement you have with the fund managers?

11/14/24 8:48:39 AM EST

+17176291559

I can definitely get a phone call with you. Two things. 1) I'm on phone call and teams call nonstop so I'm multitasking. 2) I give a exact date is the minute I fail you and I know how much I failed you. I'm not avoiding the question. I'm trying to get clarity so I can give you a 99.999% commitment.

11/14/24 8:48:54 AM EST

+17176291559

Do you want to schedule time tomorrow afternoon as I could talk then?  
Or late morning

11/14/24 8:49:09 AM EST

yes please.

11/14/24 8:50:08 AM EST

prefer late morning

11/14/24 8:51:14 AM EST

and there is no way your funding sources can close on some of the  
investor buyouts that are not in dispute and allow you to gain liquidity?

11/14/24 8:51:43 AM EST

can we talk late morning today?

11/14/24 8:52:27 AM EST

I know the finance/accounting team is hanging on by a thread here  
waiting for this to get resolved and obtain liquidity. Brandon especially.

11/14/24 8:57:48 AM EST

Can we talk now please ?

11/14/24 9:04:50 AM EST

I can't wait until tomorrow.

11/14/24 9:08:57 AM EST

Please?

11/14/24 9:33:34 AM EST

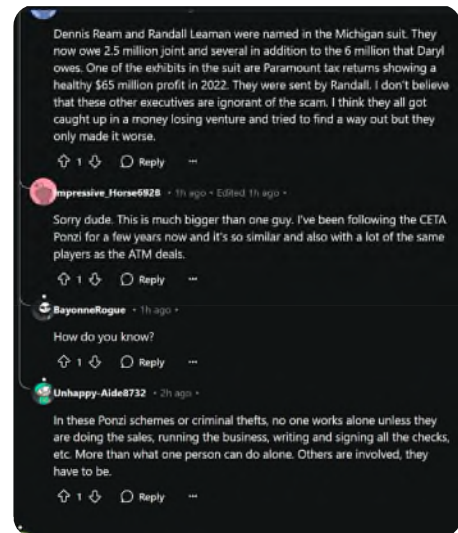
current reddit post.

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Certification in Support Page 555 of 810

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11/14/24 9:33:37 AM EST



11/14/24 9:34:34 AM EST

please see Torosian email.

11/14/24 9:35:41 AM EST

+17176291559

I'm not seeing my phone every minute, I apologize.

Jeff is not part of this anymore as it will not litigate. He's simply so on the stipulation. Him and Haverstick just want to get in a room and fight.

11/14/24 9:35:59 AM EST

yep.

11/14/24 9:36:13 AM EST

please can we talk now?

11/14/24 9:40:48 AM EST

+17176291559

I will call you when we end our meeting. Please tell the finance team I will meet with them next week.

Just so you know, Jordan Murch is two or three of the aliases on Reddit. Confirmed as he leaked it to someone that called me. He is posing as fit challenge ad5 something.  
I have not read Reddit as I've been encouraged to not read the papers or Reddit it and just get this resolved from people that I've been through similar things. Reddit is a bunch of trolls and a couple investors that are disgruntled and a couple Mirch guys. It's a coward forumn where no one has to give their true identity. I totally appreciate you wanting to know what's on there, but lid encourage you not to spend time on it as it will just mess with your head.

11/14/24 9:41:37 AM EST

I agree and understand. It's just that most if not all of our employees are reading this.

11/14/24 9:43:29 AM EST

+17176291559

Do we want to put a message out to them? Armada was fully approved through multiple audits.

11/14/24 9:43:40 AM EST

+17176291559

Sec

11/14/24 9:43:41 AM EST

armada?

11/14/24 9:43:54 AM EST

+17176291559

Our model\*

11/14/24 9:44:30 AM EST

yes. I'm fine. just wanted you to be aware that my inability to communicate what is going on is being filled by what people read in reddit.



11/14/24 9:47:51 AM EST

+17176291559

Do you want me to have an all company meeting?

11/14/24 9:48:33 AM EST

yes. I think that's appropriate given the delay in resolving the investor funding. Everyone was aware that this was supposed to be resolved this week.

11/14/24 9:50:29 AM EST

did you see Brandon's text that our cash is not allowed to be released from FNB? I suspect superior is taking this.

11/14/24 9:50:53 AM EST

+17176291559

wtf!

11/14/24 9:51:04 AM EST

+17176291559

He needs to keep everything in JBT

11/14/24 9:51:07 AM EST

I don't know that for sure.

11/14/24 9:52:44 AM EST

when are you available for a company meeting?

11/14/24 9:54:42 AM EST

+17176291559

I just reached out to Chris

11/14/24 9:55:32 AM EST

we sent them new terminals totaling nearly \$90k in GP yesterday. They should have everything they needs

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net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

11/14/24 9:56:33 AM EST

+17176291559

Just to mitigate this nightmare, don't you think we should add some terminals to get it to 100 or 110 K?

How many total ATMs is it for the 90 K?

11/14/24 9:56:41 AM EST

+17176291559

Please send to me if I don't already have it

11/14/24 9:56:44 AM EST

i tried. we don't have any

11/14/24 9:57:25 AM EST

all of the other ATMs are connected with acquisition partners who get paid monthly based on performance

11/14/24 9:57:52 AM EST

+17176291559

How many total ATMs is it?

11/14/24 9:58:19 AM EST

338

11/14/24 9:58:32 AM EST

+17176291559

OK, just leave it at that for now

11/14/24 9:58:32 AM EST

337

11/14/24 9:59:07 AM EST

see your inbox for the list. subject is Express OMV and PowerQwest Terminals

11/14/24 10:02:36 AM EST

by the way, I'm maxing out my personal credit card to pay vendors.

11/14/24 10:03:08 AM EST

please call me when you are off the current call.

11/14/24 10:36:58 AM EST

my personal bank account is getting held too.

11/14/24 10:37:16 AM EST

my wife's and my paychecks are getting held

11/14/24 10:37:32 AM EST

garnishment

11/14/24 10:37:41 AM EST

I'm sure Dennis is on there as well.

11/14/24 10:39:07 AM EST



11/14/24 10:40:32 AM EST

+17176291559

I text Chris 3x. Will call him in a couple minutes

11/14/24 10:41:08 AM EST

+17176291559

Is your personal account frozen or are you just assuming it will happen?

11/14/24 10:41:19 AM EST

+17176291559

Kris just responded that he's with his mom and he's gonna call me. I will step out of here to talk to him.

11/14/24 10:41:26 AM EST

assuming it will happen as it is listed on this writ

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11/14/24 10:43:34 AM EST

+17176291559

I'm begging and pleading with him on text. I don't think he thought this would happen as he was going down the other road. I told him he needs to put everything on hold.

11/14/24 10:43:51 AM EST

that doesn't seem to matter to him.

11/14/24 10:44:05 AM EST

I'm still out \$86k

11/14/24 10:44:09 AM EST

in coinbase

11/14/24 10:45:22 AM EST

+17176291559

I will pay you that. Prepared to do whatever I need to do with Chris when he calls me

11/14/24 10:48:30 AM EST

fucking hell...

11/14/24 10:48:50 AM EST

driving me nuts

11/14/24 10:49:47 AM EST

my guess is that he does nothing.

11/14/24 10:50:44 AM EST

+17176291559

Yes, it's insanity and I'm sorry, Randall. I actually think he will do something. I've known this guy for a long time.

11/14/24 10:55:35 AM EST

I still want to talk to you please about investor stuff.

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11/14/24 11:00:14 AM EST

+17176291559

Yes, but I need to get this Chris thing resolved and I'm still with the funders

11/14/24 11:00:40 AM EST

+17176291559

Can you please talk to CDS and have them change our ACH to JBT letting them know we're shutting down the FNB accounts and they need to make the change today.

11/14/24 11:01:06 AM EST

we tried but it got hung up with their legal. I will see where it is at

11/14/24 11:03:54 AM EST

+17176291559

It's our money how can we not give them a new bank account stating we're closing this bank account? Are you sure that did not tie to Cypress?

11/14/24 11:04:06 AM EST

yes.

11/14/24 11:04:07 AM EST

+17176291559

David, Charles and others would definitely move it

11/14/24 11:04:23 AM EST

I will find out what's up.

11/14/24 11:24:44 AM EST

+17176291559

Chris just said Frank his attorney is calling me to resolve it

11/14/24 11:25:01 AM EST

Cool

11/14/24 11:25:37 AM EST

+17176291559

Also, I'm sending another email regarding the stipulation so please confirm your approval as well for DLA to sign a stipulation. Matthew Haverstick is threatening a lawsuit if we don't.

11/14/24 11:25:57 AM EST

OK, do you want me to reply to that email that you just sent?

11/14/24 11:26:08 AM EST

+17176291559

No, another one I'm sending right now

11/14/24 11:27:29 AM EST

Ok

11/14/24 12:12:57 PM EST

Anything on superior yet?

11/14/24 12:13:16 PM EST

+17176291559

Talked with frank. He's getting back to me with Chris.

11/14/24 12:13:25 PM EST

Ok

11/14/24 1:22:04 PM EST

Will you please call Steve Gernes about the superior questions he has

11/14/24 1:42:50 PM EST

also, we need them to remove the garnishments in Michigan as well.

11/14/24 1:43:08 PM EST

this is for both Dennis and me with the Coinbase. I think they used a different attorney

11/14/24 1:57:16 PM EST

+17176291559

Talking with chris and trying to get this resolved. Tournaments tying up payroll, cash, connect, etc.

11/14/24 2:00:33 PM EST

yep

11/14/24 2:00:44 PM EST

will you call Gernes please?

11/14/24 2:06:40 PM EST

also, when can we talk?

11/14/24 2:28:06 PM EST

Dennis is saying that our attorney in Michigan is saying that Frank said that just turning over the locations isn't enough. that there will need to be a cash payment in addition. Is this accurate?

11/14/24 2:28:24 PM EST (Edited 11/14/24 2:33:16 PM EST)

maybe our attorney heard wrongly

Edited

11/14/24 2:29:08 PM EST

but our attorney is saying that we are basically screwed if they don't agree to remove this and that we agreed that we committed fraud in the documents we signed

11/14/24 2:29:45 PM EST

he said that there is nothing legal can do to stop this.

11/14/24 2:33:37 PM EST

WHEREAS, on August 8, 2024, Superior filed a Complaint commencing a lawsuit in Oakland County Circuit Court against the Paramount Parties alleging, among other things, Breach of the MSA; Breach of Personal Guaranty; Conversion, Fraud in the Inducement, Unjust Enrichment, Civil Conspiracy and Claim and Delivery, Case No 24-209106-CB (the "Litigation").

11/14/24 2:37:30 PM EST

This is on public record for everyone to see.

11/14/24 2:53:08 PM EST

did you speak to Gernes?

11/14/24 3:17:23 PM EST

did you speak to gernes about Superior? Chris reached out to him but Gernes wants to talk to you first before calling him back .

11/14/24 3:17:51 PM EST

I just don't want Chris to pull back on the garnishment because we aren't responding

11/14/24 3:22:40 PM EST

+17176291559

I've been talking to Chris nonstop. And Sabbah

11/14/24 3:25:06 PM EST

Ok

11/14/24 3:25:09 PM EST

Cool

11/14/24 3:25:54 PM EST

Are we getting this worked out?

11/14/24 3:28:21 PM EST

+17176291559

Yes but sabbah needs a day to evaluate.

11/14/24 3:28:40 PM EST

Cool do they need anything else from us?

11/14/24 3:29:15 PM EST

+17176291559

No but I think we need an offer from another 50 or or 100 ATMs. I don't care if there's profit share on them.

11/14/24 3:30:03 PM EST

The problem is, I won't be able to know how to calculate margin to pay the partner



Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.  
net, +17179175670, randall.leanman@paramountmgp.com, +17179172753

11/14/24 3:31:36 PM EST

Can they be processing only locations? We don't own the ATMs

11/14/24 3:32:47 PM EST

+17176291559

Hang tight

11/14/24 3:35:47 PM EST

asking Scheck to search through the list again to see if we can find more

11/14/24 3:56:40 PM EST

we found another 40 locations that were installed this year but don't have a lot of history generating about \$6k per month. Also, we have another portfolio with 15 terminals generating \$3,400 GP per month. So total of 55 terminals and nearly \$10k per month

11/14/24 4:01:57 PM EST

I found another 506 locations but they only generate \$16k of GP.

11/14/24 4:03:04 PM EST

➔ Replying to you, 2024-11-14 16:01:57: « I found another 506 locations but they only generate \$16k of GP. »

ignore this

11/14/24 4:03:40 PM EST

it is 217 terminals generating \$20k per month GP

11/14/24 4:06:01 PM EST

to summarize above — total of 272 terminals found generating about \$30k per month in GP

11/14/24 4:18:27 PM EST

Third stipulation signed and returned.

11/14/24 4:18:35 PM EST (Edited 11/14/24 4:19:41 PM EST)

by Torosian

Edited

11/14/24 4:33:56 PM EST

FNB notified us that they are going to start bouncing checks

11/14/24 4:34:04 PM EST

this hasn't been resolved

11/14/24 4:41:12 PM EST

This will impact customers badly

11/14/24 4:50:17 PM EST

+17176291559

I just sent this to Kris. I spoke to Sabah and Suppa feeding him information. Chris is telling me he will remedy it once Saba gives him a greenlight.

11/14/24 4:52:01 PM EST

How much GP are they looking for?

11/14/24 4:52:39 PM EST

We will need cash from you in JBT tomorrow. How much can you send us?

11/14/24 4:54:19 PM EST

+17176291559

Just send that.

11/14/24 4:54:29 PM EST

+17176291559

I'll find out in morning but I can send something

11/14/24 4:55:02 PM EST

Send what?

11/14/24 4:56:58 PM EST

What am I supposed to send?

11/14/24 4:59:34 PM EST

Can we talk now?

11/14/24 5:03:10 PM EST

+17176291559

I'm still with sorrenson

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.  
net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

11/14/24 5:03:40 PM EST

Not sure who that is but I still need to talk with you

11/14/24 5:11:00 PM EST

➔ Replying to you, 2024-11-14 16:56:58: « What am I supposed to send? »

What am I supposed to do here?

11/14/24 5:28:43 PM EST

I don't see how we're gonna have this resolved anytime soon for superior. Can we put them on a payment plan of some kind to pay them off?

11/14/24 5:30:14 PM EST

+17176291559

Working on it right now

11/14/24 6:19:34 PM EST

See email from Nate Heller. Another garnishment and lawsuit.

11/14/24 6:29:24 PM EST

+17176291559

I emailed her earlier this morning. They're getting paid off.

11/14/24 6:29:37 PM EST

Ok

11/14/24 6:41:10 PM EST

Any further thoughts on superior?

11/14/24 7:02:56 PM EST

+17176291559

On worth them know

11/14/24 7:03:04 PM EST

+17176291559

What is Steve number?

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

11/14/24 7:04:16 PM EST

612-751-4179

11/14/24 7:21:09 PM EST

+17176291559

We need to call John in the morning, but they are going to resolve this and remove all the personal and Company garnishes. What time can you talk in the morning?

11/14/24 7:21:25 PM EST

+17176291559

Krys is calling Steve at FNB right now as well as the attorney. He said he'll have him call in the next 20 minutes.

11/14/24 7:21:32 PM EST

John scheck?

11/14/24 7:22:20 PM EST

+17176291559

John at phoneco

11/14/24 7:22:28 PM EST

Oh

11/14/24 7:23:06 PM EST

I can talk at any time. 7:30?

11/14/24 7:23:17 PM EST

Not sure when he is available

11/14/24 7:24:10 PM EST

What is our plan?

11/14/24 7:25:06 PM EST

+17176291559

930?

11/14/24 7:25:12 PM EST

Sure.

11/14/24 7:25:20 PM EST

+17176291559

Chris is calling me back

11/14/24 7:25:23 PM EST

Ok

11/14/24 7:27:47 PM EST

Do you want John Barnard on the call at 9:30 too?

11/14/24 7:41:17 PM EST

+17176291559

No

11/14/24 7:41:46 PM EST

Ok What is the plan?

11/15/24 9:17:32 AM EST

+17176291559

Working w Chris and bank. Will get to you on John later this morning. I'll be driving fur 5 hours staring at 1030 so time to talk

11/15/24 9:22:59 AM EST

Liked "Working w Chris and bank. Will get to you on John ..."

11/15/24 9:26:23 AM EST

can you send us any cash at all? really desperate here. Have customer issues everywhere

11/15/24 10:22:55 AM EST

Dennis just called and flipped out on me. They took his money from his checking account. I guess mine is next

11/15/24 10:29:09 AM EST

can we talk now?

Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.net, +17179175670, randall.leanman@paramountmgp.com, +17179172753

11/15/24 12:29:58 PM EST

+17176291559

I'm dealing with a Heller Capital Group account being garnished. As soon as I get off these calls, I will call you.

11/15/24 12:30:27 PM EST

OK, thanks

11/15/24 12:42:56 PM EST

+17176291559

You can

11/15/24 12:43:23 PM EST

+17176291559

You can move your money to Citibank American Express or another large bank account immediately online. That's what I suggested a couple weeks ago to you. I did that.

11/15/24 1:37:33 PM EST

+17176291559

Can we talk about John quickly and then a call later this afternoon to catch up on the other items. I need to get the John issue resolved as critical to getting all this behind us.

11/15/24 1:48:26 PM EST

+17176291559

On w Sabbagh

11/15/24 2:18:08 PM EST

John Barnards mobile  
+1 (708) 514-7857

11/15/24 3:22:30 PM EST

I told John Barnard we need \$6 million. 5 million next week and 1,000,000 over 12 months he thinks he can do that.

11/15/24 3:23:03 PM EST

Ok?

Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

11/15/24 3:23:25 PM EST

Told him I need a term sheet from him over the weekend

11/15/24 3:23:33 PM EST

+17176291559

Sure. Start at 7.5?

11/15/24 3:24:05 PM EST

I didn't.

11/15/24 3:24:15 PM EST

I felt like this was the right number that would get him to move quickly

11/15/24 3:24:30 PM EST

+17176291559

K

11/15/24 3:25:00 PM EST (Edited 11/15/24 3:25:11 PM EST)

Plus, if he ever looked at the original filings of the lawsuit to be able to see that too, so it would be consistent

Edited

11/15/24 3:36:50 PM EST

It will actually be closer to 6.3 because we owe him about 2 to 300 K for stuff from 2023 advances equipment, etc. I told him that needs to be plus the 6 million

Text message

11/16/24 9:06:29 AM EST

Good morning Daryl. Any chance we can talk today?

iMessage

11/16/24 10:10:53 AM EST

also, average monthly GP for Phonco YTD through September has been \$160k.

11/16/24 10:11:30 AM EST

so the \$200k number in the agreement will need to be supplemented with additional business.

11/16/24 10:38:50 AM EST

Just sent this to John Barnard

11/16/24 10:38:52 AM EST

Good morning John, we have an agreement from the other side and need to sign this Monday morning or they will continue collection processes which we need to avoid. If you are interested in purchasing this, I will need a binding LOI from you by first thing Monday morning. Again, in order to keep the legal process at bay, we will need to be funded by Tuesday. Otherwise, we will need to sign the agreement they have in front of us. I understand if this is too quick for you but wanted to set expectation as they have a gun to our head at the moment and we can't allow this to interfere with our overall investor refinance.

11/16/24 10:52:13 AM EST

Chris reached out to Dennis and said that no one has responded to him on his text to you and Steve.

11/16/24 10:57:23 AM EST

FYI. Regarding Sharenet from Devin: Thanks, Daryl. Davis's lawyer says they intend to proceed with issuing Article 3 notices to Sharenet's customers. If there are any further developments that I should share with Davis's counsel, please let me know.

11/16/24 11:15:32 AM EST

Also, it gets worse with Phonco GP we're in the 135K range now I asked team to update and validate and that's the number they gave me so we will need to supplement with additional locations. Do you want us to do that?

11/16/24 12:31:20 PM EST

John Barnard looked at the economics based on the current GP that i related to you. He said there's no way he can do 6 million. He is going to be all in at 5 million. I agreed to that they will wire it Tuesday. He's getting a binding letter of intent together. He wants this deal and he does not want it to go to somebody else. Is this book free and clear of the investors?

11/16/24 12:33:51 PM EST

+17176291559

I'm hunting with limited service. How can it be down to 135?



11/16/24 12:34:03 PM EST

+17176291559

And that's only paying 30 times. Isn't it worth a lot more to him?

11/16/24 12:34:08 PM EST

+17176291559

I thought he generally sends us about 160 or 180

11/16/24 12:34:15 PM EST

+17176291559

His margin would come back in at

11/16/24 12:34:23 PM EST

+17176291559

That's only 30x

11/16/24 12:34:42 PM EST

It's down to 135K because of terminal losses interest rate increases and transaction declines, which have been about 10% a year year on year

11/16/24 12:34:54 PM EST

We haven't recorded higher because I was trying to negotiate a better rate and thought I had had that accomplished and we did not

11/16/24 12:35:27 PM EST

+17176291559

But last month we got 160 K from him?

11/16/24 12:35:56 PM EST

No, we did not. We are recording the difference between what I was told him the beginning of the year we were willing to pay but ultimately he's not budging off the 225K per month.

11/16/24 12:36:17 PM EST

Plus he hat doesn't have everything. We have some things with ASI so additional margin but ultimately I had Scheck run through the numbers again this morning and he says we're at about 135 to 140 K max.

11/16/24 12:37:12 PM EST

Honestly, right now just trying to get a deal done and get some extra cash that we can use to pay for customers. We owe Chris 2.6 million correct

11/16/24 12:37:30 PM EST

+17176291559

We definitely definitely can't have him hold back another 300 K whatever you were saying yesterday. What was that for?

11/16/24 12:37:43 PM EST

No, I told him it's gotta be all in at five. He can't be doing anything else.

11/16/24 12:37:47 PM EST

He agreed

11/16/24 12:38:11 PM EST

Are these terminals free and clear on the investor program because that would be a massive problem if they came after those terminal

11/16/24 12:38:50 PM EST

+17176291559

Let me check I'm gonna be out of service again for a couple hours.

11/16/24 12:41:49 PM EST

OK

11/16/24 2:18:20 PM EST

John,

Based on our discussion:

- 1 \$5M purchase price wired by Tuesday November 19.
- 2 No reduction/offset for any amounts owed for prior advances/bonuses, theft losses, etc.
- 3 Phonco/Telco or TBD to take over ownership of all terminals that were purchased from Phonco.
- 4 Paramount to maintain existing relationships on communications, processing, armored, vault cash and maintenance and bill Phonco monthly at Paramount cost until such time as Phonco decides to change relationships.

Please ask your counsel to draft of binding letter of intent that we can execute by Monday morning November 18.

Please let me know if I missed anything.

Thanks!

11/16/24 2:18:32 PM EST

he is committed to doing this.

11/16/24 2:26:05 PM EST

assuming we owe Chris \$2.6M this will net us \$2.4M which I will use to pay customers, vendors, etc.

11/16/24 2:26:51 PM EST

this should hold us over until you are able to close investor program and provide additional liquidity

11/16/24 2:35:46 PM EST

Also, we need to get credit from Chris for the money he took from Dennis and me so it will be less than \$2.6M

11/16/24 2:46:07 PM EST

+17176291559

He's going to return it. He's not accepting 2.6 million. He said he did not tell Denis that. He was at ❤️ last night. Now he's at 3.6 as of two hours ago. I will get it into the low threes.

11/16/24 2:47:01 PM EST

ok. we need confirmation of this so that when we sign with John Barnard the deal is done.

11/16/24 2:47:28 PM EST

+17176291559

I'm messaging him right now, while I still have service

11/16/24 2:47:35 PM EST

ok.

11/16/24 2:47:46 PM EST

he told Dennis that all he needed was \$2.6M

11/16/24 2:47:58 PM EST

and that if he got that he would go away.

11/16/24 2:49:47 PM EST

+17176291559

Tell Denis to message him

11/16/24 2:57:45 PM EST

Is investor program closing on Wednesday according to the stipulation?

11/18/24 8:06:44 AM EST

What is the likelihood that this closes this week? I need to prepare staff one way or the other as they all know the stipulation.

11/18/24 8:10:06 AM EST

also, need you to attend company meeting that I'm waiting to schedule based on your availability

11/18/24 8:58:40 AM EST

given your lack of responses to investor related questions, I am feeling relatively certain that this is all going to collapse very soon. I'm hoping we can get out of superior before it does so at least my personal assets are protected.

11/18/24 8:59:21 AM EST

I am quite afraid right now.

11/18/24 9:02:08 AM EST

+17176291559

I am responding to them. I'm trying to make sure we have final clarity. The Chris thing is concerning based on the Wednesday motion. He said he's going to dismiss it. I'm now asking him just to delay it for a week or two.

11/18/24 9:02:19 AM EST

+17176291559

He just agreed to 3.35m

11/18/24 9:02:43 AM EST

Liked "He just agreed to 3.35m"

11/18/24 9:03:16 AM EST

+17176291559

When can you send me the email as I need to get it to Krys ASAP?

11/18/24 9:03:36 AM EST

i have steve and scheck working on it. I should have momentarily.

11/18/24 9:03:55 AM EST

+17176291559

From Chris

\$3,350,000 by close of business Tuesday or Wednesday. This will be my last text on this. Thanks.

11/18/24 9:19:25 AM EST

you need to get legal counsel ready or we are fucked if this doesn't go through

11/18/24 9:22:18 AM EST

email coming to you and sabah very soon.

11/18/24 10:16:47 AM EST

need cash today please. Can you send us \$100k?

11/18/24 10:16:57 AM EST

need to at least pay clatworthy

11/18/24 10:18:34 AM EST

+17176291559

➔ Replying to you, 2024-11-18 09:22:18: « email coming to you and sabah very soon. »

I need what you sent to Denis in an email. When is it coming?

11/18/24 10:59:46 AM EST

Can you send us any cash today?

11/18/24 11:01:02 AM EST

+17176291559

Will probably struggle. provisional credit did not come through yet. I'll talk to Clatworthy and try to get him to hold. Did we pay him anything Friday?

11/18/24 11:01:34 AM EST

Yes. We sent \$70k on Friday . We promised another \$70k today

11/18/24 11:33:00 AM EST

you need to speak with John Barnard. he is asking too many questions that I cannot answer.

11/18/24 11:35:16 AM EST

asap or this deal won't get done

11/18/24 11:35:43 AM EST

708-514-7857

11/18/24 11:35:48 AM EST

he is expecting your call.

11/18/24 11:36:41 AM EST

please respond so I know you see this text as you have notifications silenced.

11/18/24 11:40:22 AM EST

+17176291559

Call him shortly

11/18/24 11:41:43 AM EST

Liked "Call him shortly "

11/18/24 12:10:09 PM EST

Please give me an update after you've spoken to him

11/18/24 12:29:23 PM EST

sabah and chris are asking Steve the following question

11/18/24 12:29:25 PM EST

Second from Sabah:

How much is Paramount getting from Phonco? After they are paying merchant and the \$225 per terminal?

11/18/24 12:29:46 PM EST

they are going to see that we are only doing about \$135k per month in GP. you ok with that?

11/18/24 12:35:10 PM EST

+17176291559

On w John

11/18/24 12:35:17 PM EST

ok

11/18/24 12:35:26 PM EST

+17176291559

Dies he have any dispensaries

11/18/24 12:35:48 PM EST

just a small number. I believe less than 10.

11/18/24 12:36:03 PM EST

we lost all that we had before that is what caused big margin drop

11/18/24 12:44:09 PM EST

+17176291559

How did we lose? Where did they go? How did this account go from mid to high 400k to 135k?

11/18/24 12:44:39 PM EST

we lost because they were on a month to month agreement. The client decided to handle himself.

11/18/24 12:45:42 PM EST

PhonCo GP Bridge to Model		
Model GP	\$	484,559
Transaction decline	\$	(125,566)
Terminal loss	\$	(78,829)
Margin compression on Surcharge and Interchange	\$	(39,237)
Cash Management cost escalation	\$	(109,867)
Current Avg GP	\$	131,060

11/18/24 12:46:11 PM EST

Transaction declines are what we are seeing every where. 8 to 10% per year.

11/18/24 12:46:20 PM EST

terminal loss is primarily the dispensaries

11/18/24 12:46:49 PM EST

margin compression on surcharge and interchange is a result of people withdrawing more cash per transaction

11/18/24 12:47:04 PM EST

cost management cost escalation is related to interest rate increases for cost of cash

11/18/24 12:52:50 PM EST

we are seeing similar dynamics occurring everywhere.

11/18/24 12:54:21 PM EST

➔ Replying to you, 2024-11-18 12:29:46: « they are going to see that we are only doing about \$135k per month in GP. you ok with that? »

need your response



11/18/24 12:54:26 PM EST

➔ Replying to you, 2024-11-18 12:29:46: « they are going to see that we are only doing about \$135k per month in GP. you ok with that? »

please

11/18/24 1:28:41 PM EST

any response?

11/18/24 1:30:06 PM EST

+17176291559

I spoke to JON and also his counsel for 20 minutes. They were going to chat after my call. Jon seems scattered but committed to do the deal however he seems to be all over the place. Why don't you quickly call him. They were pushing for later this week and I said it has to be today or tomorrow.

11/18/24 1:30:51 PM EST

How should we respond to Chris and sabah?

11/18/24 1:57:13 PM EST

I just spoke to John and his counsel as well. I told him he needs to let us know or we are going to go with handing over to superior.

11/18/24 1:58:55 PM EST

+17176291559

Do you think he is getting cold feet?

11/18/24 1:59:02 PM EST

maybe.

11/18/24 1:59:03 PM EST

+17176291559

He seemed still committed on my call

11/18/24 1:59:15 PM EST

it's hard to tell with him.

11/18/24 1:59:25 PM EST

+17176291559

But his legal was going to talk to him after I hung up

11/18/24 1:59:55 PM EST

+17176291559

Yes, get Chris what we have access to to asap. I would not define the GP is only 135k but provide him all what he needs and let him put it together

11/18/24 1:59:59 PM EST

yes. but this is how john operates. they were still struggling

11/18/24 2:00:05 PM EST

yes.

11/18/24 2:00:07 PM EST

will do

11/18/24 2:00:42 PM EST

+17176291559

Can quickly send me the serial numbers/TIDs we sent to Chris for the first 300 last week that represent the 90k?

11/18/24 2:00:54 PM EST

+17176291559

John wanted those as they are what is encumbered

11/18/24 2:00:57 PM EST

yes. working on that too. John requested

11/18/24 2:03:33 PM EST

just sent to John and you

11/18/24 2:05:22 PM EST

will you please give me an update on the investor program?

11/18/24 2:05:31 PM EST

what's happening?

11/18/24 2:05:40 PM EST

and when is this going to close/

11/18/24 2:05:42 PM EST

?

11/18/24 2:06:06 PM EST

I don't need you to be 100% sure on your information but just a gut is fine

11/18/24 2:16:33 PM EST

+17176291559

On w bank.

11/18/24 2:16:47 PM EST

ok. I need to talk to you

11/18/24 2:38:02 PM EST

Please call me when you are off the call.

11/18/24 2:44:07 PM EST

Should I call Torosian?

11/18/24 2:44:55 PM EST

This is what happened the last time we got screwed. Down the wire and everything is going to be ok till it wasn't.

11/18/24 2:48:09 PM EST

We have given Chris and Sabah everything they requested.

11/18/24 3:11:42 PM EST

If we don't have this resolved tonight firmly, I'm reaching out to Torosian

11/18/24 3:20:21 PM EST

Tonight.

11/18/24 3:20:50 PM EST

+17176291559

I just called John twice. I need to know if he's going to do this deal.

The fun managers legal reached out to Chris legal And told him he can't do that. I think it will resolve. I'm working every angle. We can engage Jeff if you want, but he'll be a pain in the ass and will cost hundreds of thousands.

I'm trying to get answers from Jon and Chris

11/18/24 3:22:00 PM EST

I think we just need to commitment that they will not hold this hearing on Wednesday and delay it. If that's the case I know we can get John Bernard on board with a little more time.

11/18/24 3:23:20 PM EST

Can we just ask Jeff to send a letter to them acknowledging that they are representing us and requesting more time? For five or 10 grand?

11/18/24 3:23:58 PM EST (Edited 11/18/24 3:24:08 PM EST)

As long as we have a gun to our head, they're gonna move forward with the hearing Regardless

Edited

11/18/24 3:24:22 PM EST

These are not generous or gracious people that we are dealing with

11/18/24 3:25:15 PM EST

+17176291559

Try calling Jon again

11/18/24 3:25:53 PM EST

+17176291559

➔ Replying to you, 2024-11-18 15:23:20: « Can we just ask Jeff to send a letter to them acknowledging that they are representing us and requesti... »

Probably but we could have other counsel do it as well including Sasha

11/18/24 3:26:12 PM EST

+17176291559

I'm trying Chris

11/18/24 3:26:17 PM EST

Sasha won't do it and the only Michigan council that we have with those guys that we told him we wouldn't work with them. They wanted a 20 K deposit retainer.

11/18/24 3:26:52 PM EST

+17176291559

Well, Jeff is Illinois not Michigan. They probably have representation in Michigan.

11/18/24 3:27:12 PM EST

I would imagine nothing to do and they got us off with Jerry and appointing a trustee

11/18/24 3:29:44 PM EST

But I don't understand. Is it that if the fund managers will not allow Chris to take these how can we convey them to John Barnard?

11/18/24 3:43:12 PM EST

+17176291559

It's Paramount. It was the receivership he's trying to force on Paramount. That's the issue.

11/18/24 3:43:44 PM EST

Ahh..

11/18/24 3:44:49 PM EST (Edited 11/18/24 3:45:02 PM EST)

Could the fund manager's legal send representation there to fight it?

Edited

11/18/24 3:51:57 PM EST

Ray Davis is asking when he will get funded. Can I give a date that is 75% certain? If so, what is it?

11/18/24 3:52:25 PM EST

I don't want him notifying our customers that their locations are for sale.

11/18/24 3:57:49 PM EST

Here is what I'm going to tell them unless you tell me otherwise.

11/18/24 3:57:56 PM EST (Edited 11/18/24 3:58:47 PM EST)

I'm trying to get a more definite response from Daryl. As I understand it, the fund managers need some time with their investors to prepare for this and requested the delay. The current stipulation approved by both sides and filed with the court is closing on November 20. We expect funding to occur shortly thereafter.

Edited

11/18/24 4:07:40 PM EST

Chris wants to talk to John Barnard. Ok?

11/18/24 4:13:50 PM EST

he told them that he is paying us \$5M

11/18/24 4:36:19 PM EST

+17176291559

Hang tight

11/18/24 4:37:10 PM EST

He is talking to Chris and seeing if he can work a deal out directly with him and put something in escrow until he does a lein search.

11/18/24 4:43:10 PM EST

+17176291559

Dude that is high risk.

11/18/24 4:43:33 PM EST

john's worried that the investors own these ATMs.

11/18/24 4:43:36 PM EST

+17176291559

I'm not following. We need John to do the deal right now. Chris will Duffing fuck this thing up. Is Chris talking to John or John talking to Chris?

11/18/24 4:43:50 PM EST

+17176291559

Will fuck this up

11/18/24 4:43:50 PM EST

John talking to Chris.

11/18/24 4:44:23 PM EST

+17176291559

Meaning Chris will.

11/18/24 4:44:29 PM EST

yes.

11/18/24 4:44:30 PM EST

+17176291559

I'll call John.

11/18/24 4:44:33 PM EST

ok.

11/18/24 4:44:43 PM EST

+17176291559

Did you send the serial numbers to John that we sent Chris?

11/18/24 4:44:49 PM EST

yes

11/18/24 4:45:45 PM EST (Edited 11/18/24 4:47:29 PM EST)

John read all of the articles in the paper and feels like we are not going to make it or that the investors already own these ATMs.

Edited

11/18/24 4:45:59 PM EST

and that he is going to be in court trying to keep the ATMs.

11/18/24 5:27:41 PM EST

Investor closing on Wednesday?

11/18/24 5:30:03 PM EST

They garnished my belco account. Now I can't pay bills.

11/18/24 5:30:13 PM EST

I can't even login

11/18/24 5:36:47 PM EST

+17176291559

Dude open up Citi account.

11/18/24 5:36:57 PM EST

+17176291559

I just talked for 45 minutes with John

11/18/24 5:37:50 PM EST

+17176291559

We put together strategy and he is ready to execute it. See email I just sent. I think this is resolved. He may want to hold 50% of the remaining \$1.65M we are to get.

11/18/24 5:38:02 PM EST (Edited 11/18/24 5:38:13 PM EST)

I opened a Fidelity account, but my paycheck got deposited into belco before I can get it switched

Edited

11/18/24 5:38:47 PM EST

➔ 2024-11-18 17:37:50: « We put together strategy and he is ready to execute it. See email I just sent. I think this is resolved. He may want... »

How long will he hold it?

11/18/24 5:46:35 PM EST

+17176291559

It's still up for negotiation. I hope there's zero hold on it. He's just floating that out there and I showed resistance to it.

11/18/24 5:47:23 PM EST

Maybe you could tie to investor funding and release as this is his concern?



11/18/24 5:47:53 PM EST

+17176291559

Yes, right now the superior deal is delaying the investor deal because it looks like they could get receivership Wednesday morning. I can't believe Criste did this.

11/18/24 5:48:29 PM EST

Please never deal with him again

11/18/24 5:48:37 PM EST

Flaming dick

11/18/24 5:48:56 PM EST

+17176291559

never!

11/18/24 5:50:55 PM EST

How long will this delay investor closing?

11/18/24 5:54:07 PM EST

Also, if you wanna give a little more weight to your email, Jonathan Weiss, which is John Barnard's attorney could send a letter also indicating this commitment to Chris.

11/18/24 5:58:00 PM EST

+17176291559

➔ Replying to you, 2024-11-18 17:50:55: « How long will this delay investor closing? »

Maybe a day. It depends when Chris cancels the hearing. I'm hoping he does it tonight yet.

11/18/24 6:01:53 PM EST

OK, probably what do you wanna do is get Jonathan Weiss to send a letter tonight. I think he's already offered to do that. I think it would lend more credence to this.

11/18/24 7:45:45 PM EST

Any response from Chris?

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

11/18/24 7:55:37 PM EST

+17176291559

Multiple calls in. He already told the lawyers of investors that he will work with him and remove Wednesday hearing. I asked them to get it in writing.

11/18/24 7:55:52 PM EST

+17176291559

Why he's on predictable? I'm confident he will do both these deals.

11/18/24 7:56:15 PM EST

Liked "Multiple calls in. He already told the lawyers of ..."

11/18/24 7:56:19 PM EST

Thanks!

11/18/24 7:56:54 PM EST

+17176291559

➔ 2024-11-18 19:55:52: « Why he's on predictable? I'm confident he will do both these deals. »

While he is unpredictable

11/18/24 7:57:00 PM EST

Yep

11/18/24 7:57:33 PM EST

Do I get funded on Wednesday or Thursday too?

11/18/24 8:06:53 PM EST

+17176291559

I just spoke to Chris. He's wanted to dismiss, but he wants a closing binder for phoneco so he can assign it and then put language in that. It will become no void with a phoneco payment.

11/18/24 8:07:07 PM EST

+17176291559

I presume we have electronic closing binder? Can we quickly send out to Chris tonight and Frank?

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.  
net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

11/18/24 8:07:30 PM EST

I don't know what you mean by this?

11/18/24 8:07:43 PM EST

Closing binder?

11/18/24 8:07:49 PM EST

+17176291559

The closing documents/Billis sale we used when we bought Ponco

11/18/24 8:07:58 PM EST

Ahh... yes

11/18/24 8:08:13 PM EST

I will email to you.

11/18/24 8:08:58 PM EST

+17176291559

Emailed to Chris and Frank and me

11/18/24 8:09:41 PM EST

All docs?

11/18/24 8:09:57 PM EST

+17176291559

Whatever the closing documents were

11/18/24 8:10:04 PM EST

Yep

11/18/24 8:10:05 PM EST

+17176291559

Definitely near the bill of sale and the purchase agreement

11/18/24 8:14:14 PM EST

just emailed

11/19/24 6:43:53 AM EST

Good morning Daryl. I hope Chris is not filing our Phonco closing docs with the courts and making this a matter of public record. If so, John Barnard will go ballistic. He wanted to make sure his locations stayed confidential. This could ruin the deal for us.

11/19/24 6:48:06 AM EST

This doc has customer names, addresses, contract length, expiration dates surcharge splits, etc. this would be extremely bad for him as they have a ton of competition

11/19/24 6:48:40 AM EST

We simply cannot allow that information to be in public.

11/19/24 7:59:48 AM EST

That's why he wanted every one to sign a confidentiality agreement

11/19/24 8:01:15 AM EST

+17176291559

They signed confidentiality

11/19/24 8:01:43 AM EST

+17176291559

He's did

11/19/24 8:01:47 AM EST

+17176291559

Chris did

11/19/24 8:01:52 AM EST

+17176291559

And sabah

11/19/24 8:02:14 AM EST

Ok. So this isn't getting recorded at the court ?

11/19/24 8:05:35 AM EST

+17176291559

Nope. I will confirm with him.

11/19/24 8:05:44 AM EST

Ok cool. I thought it was

11/19/24 8:16:03 AM EST

So closing is still schedule for tomorrow?

11/19/24 8:33:21 AM EST

Any cash for us today ? We have nothing and need to pay Clatworthy as I promised.

11/19/24 8:37:04 AM EST

We need \$35k minimally to pay clatworthy

11/19/24 8:40:15 AM EST

I see we are scheduled for 1:1 today. I assume this will be cancelled unless I hear otherwise from you.

11/19/24 9:17:39 AM EST

Just spoke with John Barnard — he is still committed to doing the deal but needs to memorialize this some how and still acts like he's unsure how to do it. I told him he needs to speak to you. This is typical John so you will want to stay close to him.

11/19/24 9:18:07 AM EST

maybe you should call him?

11/19/24 9:18:49 AM EST

i can see this dragging out and not getting done like it did when we purchased originally.

11/19/24 9:19:14 AM EST

he's acting like he want's Gierasch to draft something for him.

11/19/24 9:19:56 AM EST

he is still worried about the investor deal going through or not and taking these assets from him if it doesn't go through.

11/19/24 9:20:29 AM EST

i told him it is scheduled to close tomorrow and all should we be good but that he'd need to confirm with you

11/19/24 9:25:40 AM EST

+17176291559

The superior receivership issue is holding it up. I noted that in a text yesterday.

I talk to him twice yesterday and the email i sent to Chris was supposed to confirm it. He knows that suit needs to go away before anything can happen. He and I agreed at 5 PM that was the best approach, but it sounds like he's now changing based on your conversations.

He wants Steve to develop an agreements versus his attorney fur sale?

11/19/24 9:28:46 AM EST

This is typical john. he agrees then wavers and goes over the same territory again. I don't know that he's changing but probably needs to be reminded. Not sure if it's an age issue or just his negotiating style. I typically remind him of conversations we already had and what he committed to doing. If Gierasch can quickly turn an agreement that might be the best way to move off the mark as he claims his attorney is against deal. I told him to stop calling me and call you as the deal needs to be done between you and him.

11/19/24 9:30:53 AM EST

you probably want to address the second payment in the agreement as well.

11/19/24 9:32:01 AM EST

I told him that if the payment is made then the Superior suit goes away. But he is also concerned about the larger investor issue.

11/19/24 9:38:03 AM EST

If investor closing is tomorrow and if John bails on us, can we get cash from the investor closing to pay Chris and just keep the Phonco book in our company?

11/19/24 9:49:44 AM EST

Maybe you need to show him the agreement between us and superior that shows the release of all of this. But again, I think it's the bigger investor issue because he's read about everything in the news and still asked me if we are going to survive or not this morning.

11/19/24 9:50:26 AM EST

So I don't know how you get him comfortable with the overall larger investor issue, but that's probably something that needs to be addressed. This is what his attorney still hitting him on.

11/19/24 9:54:03 AM EST (Edited 11/19/24 9:54:14 AM EST)

Need cash desperately please. Angry customers

Edited

11/19/24 9:57:55 AM EST

we still have customer payments from August that are not yet paid

11/19/24 10:32:14 AM EST

rumor mill running that investor deal is not going through and that Jeffery Keith and Maya are going to take over Paramount. Our people are hearing this. are you available to meet with employees this week?

11/19/24 10:44:49 AM EST

<https://www.classlawgroup.com/prestige-investment-group-atm-network-lawsuit>

11/19/24 10:44:56 AM EST

this is in reddit this morning

11/19/24 11:00:39 AM EST

+17176291559

On with John now. Do you have the simple APA template we used to use? I need to develop something for him asap.

11/19/24 11:01:16 AM EST

I have the template we used for all acquisitions. I will get and email to you. It's not simple though.

11/19/24 11:01:40 AM EST

+17176291559

I thought we had a simply one and comprehensive one.

11/19/24 11:01:45 AM EST

no.

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

11/19/24 11:01:53 AM EST

we have only ever used one.

11/19/24 11:03:05 AM EST

do you want me to send that one to you?

11/19/24 11:05:02 AM EST

+17176291559

We did. But maybe not using it.

11/19/24 11:05:09 AM EST

+17176291559

Liked "do you want me to send that one to you?"

11/19/24 11:05:17 AM EST

I don't remember that

11/19/24 11:08:50 AM EST

in your inbox

11/19/24 12:23:02 PM EST

PHJ spent the last 45 minutes with Sabah and his team. They are still going full speed that they are going to be managing the Phoenix terminals.

I'm trying to do everything to communicate well with them, but certainly don't want to screw up any potential deal with John@

Subject  
Message

11/19/24 12:23:02 PM EST

Screenshot 2024-11-19 at 12.22.47 PM  
From Gernes

11/19/24 12:23:33 PM EST

+17176291559

Chris said the paperwork he's sending us will fully resend it upon his wire hitting tomorrow. Waiting on his paperwork.



11/19/24 12:23:37 PM EST

+17176291559

See email. I'm sending John right now.

11/19/24 12:28:58 PM EST

Ok

11/19/24 12:49:46 PM EST

our cash insurance is going to be cancelled Thursday if we don't make a payment tomorrow. We owe \$86k and we don't have it. Plus we owe Clatworthy \$35k today.

11/19/24 12:55:39 PM EST

can you send us \$150k today?

11/19/24 12:56:30 PM EST

+17176291559

Chris locked multiple Heller capital accounts. I'm trying to get them released. If I can today, I can do 100k min and hopefully more

11/19/24 12:56:40 PM EST

ok. thanks

11/19/24 1:19:11 PM EST

did Chris confirm that the hearing is not occurring tomorrow? Can he send us a release

11/19/24 1:19:28 PM EST

I'm worried that he doesn't do as he said

11/19/24 1:23:47 PM EST

do you have legal looking at this? Dennis counsel is saying that Michigan law has some quirks in it that make it favorable to them. Just want to make sure we are not in a gotcha situation.

11/19/24 1:24:19 PM EST

we need something in writing now or we will need to have a lawyer represent us tomorrow morn gin

11/19/24 1:27:47 PM EST

I don't have a very good feeling about this with them. I think they are going to screw us

11/19/24 1:28:07 PM EST

they have proven that this is their way of working

11/19/24 1:28:51 PM EST

if you don't get written proof soon, I think we need to have a lawyer ready for the hearing or this could go very badly

11/19/24 1:35:31 PM EST

+17176291559

Calling him now

11/19/24 1:35:51 PM EST

+17176291559

I am slammed, can you work on the APA with the terms I sent out for John. Just skinny it down.

11/19/24 1:35:53 PM EST

thanks.

11/19/24 1:36:01 PM EST

I have a very bad feeling about this.

11/19/24 1:36:13 PM EST

+17176291559

Do you have?

11/19/24 1:36:20 PM EST

+17176291559

Calling Chris now

11/19/24 1:36:49 PM EST

I think he's going to hold us hostage to paying more to him at the last moment or have the hearing anyway when we can do nothing about it.

11/19/24 1:37:55 PM EST

➔ 2024-11-19 13:35:51: « I am slammed, can you work on the APA with the terms I sent out for John. Just skinny it down. »

I can try but feel out of my league on this.

11/19/24 1:41:35 PM EST

man, I don't feel comfortable editing this and trying to skinny down.

11/19/24 1:41:43 PM EST

I just looked at it.

11/19/24 1:42:02 PM EST

+17176291559

On

11/19/24 1:42:04 PM EST

+17176291559

Ok

11/19/24 1:42:08 PM EST

sorry.

11/19/24 1:48:25 PM EST

Or they are going to try to take the Phonco book away from us regardless.

11/19/24 1:48:46 PM EST

again bad feeling bordering on fear

11/19/24 1:50:49 PM EST

+17176291559

No, the agreement is going to stay that if we pay the 3.35 million that phoneco circles back.

11/19/24 1:50:58 PM EST

+17176291559

Trying to get a hold of Chris

11/19/24 1:51:26 PM EST

Yes, I just think that Chris drags his feet until 7:30 AM tomorrow and the hearings at 8 AM and he forces us to do whatever the hell he wants us to do.

11/19/24 1:51:38 PM EST

That's what happened the last time I guarantee that's what's gonna happen this time

11/19/24 1:51:54 PM EST

They're still working on getting all the data and understanding everything. I am sure he's just gonna say give me the book or this is over.

11/19/24 1:52:14 PM EST

He knows he has a gun to our head and we're doing nothing to defend ourselves

11/19/24 1:52:54 PM EST

I think he still goes into the hearing too

11/19/24 1:53:08 PM EST

So unless we get something very very soon from them saying they're not gonna have the hearing. We need to have somebody there on this call.

11/19/24 1:54:27 PM EST

Who can you get to join the video call to represent us?

11/19/24 1:55:16 PM EST

He had an email from you last night and still did not provide us with anything guaranteed that we are fucked

11/19/24 1:55:43 PM EST

He knows you'll do anything not to screw up the investor closing tomorrow

11/19/24 1:56:38 PM EST

The longer this goes the less power we have

11/19/24 1:56:54 PM EST

Get Torosian

11/19/24 1:57:31 PM EST

I'm telling you I've never been so sure about anything in my life

11/19/24 1:59:07 PM EST

Receivership will kill us

11/19/24 1:59:22 PM EST

All of us

11/19/24 2:01:23 PM EST

Please ask him to send us confirmation that the hearing is either canceled or postponed for tomorrow

11/19/24 2:12:19 PM EST

may I request cancellation via the email he responded to?

11/19/24 2:12:41 PM EST

+17176291559

Yes

11/19/24 2:41:18 PM EST

he isn't responding. I say we wait until 3. then pull the trigger on Torosian or anyone else you want to use

11/19/24 3:01:13 PM EST

did Chris say anything about the hearing?

11/19/24 3:06:03 PM EST

ok to engage Torosian?

11/19/24 3:08:58 PM EST

We are out of time.

11/19/24 3:14:30 PM EST

if I don't hear from you by 3:20, I'm sending this to Torosian

11/19/24 3:18:26 PM EST

+17176291559

He agreed to cancel the hearing. He was on with his legal when he talk to me. I asked for confirmation. At this point, I'm taking his word.

11/19/24 3:18:55 PM EST

so how long do we wait?

11/19/24 3:21:16 PM EST

+17176291559

He just wanted 3.6 million and asked to sign off on the documents he sending. I told him we will do so. He said he will cancel. I can only take him for his word. I think it may already be canceled as I could hear him talking to his attorney in the background, telling them to cancel it.

11/19/24 3:21:38 PM EST

ok. I will wait a little.

11/19/24 3:22:31 PM EST

bastard told us that \$3.35M was fine.

11/19/24 3:23:49 PM EST

not sure we can take him at his word

11/19/24 3:24:02 PM EST

+17176291559

Yep!

11/19/24 3:25:36 PM EST

If we don't get anything by 4. I'm sending to Torosian so he can notify them that we are represented and planning to attend. That should only cost us \$10k 😊

11/19/24 3:46:29 PM EST

steve should not be included on these docs that Frank just sent.

11/19/24 3:48:45 PM EST

+17176291559

Have you spoke to jeff?

11/19/24 3:49:06 PM EST

no. i did not reach out to to him

11/19/24 3:49:46 PM EST

did you see the docs Frank just sent?

11/19/24 3:55:00 PM EST

do you want me to reach out to Jeff?

11/19/24 3:59:51 PM EST

Hello?

11/19/24 4:07:34 PM EST

Should I execute?

11/19/24 4:19:41 PM EST

+17176291559

I am on the road. Did you read them?

11/19/24 4:19:47 PM EST

Yes.

11/19/24 4:19:58 PM EST

Five year non compete

11/19/24 4:20:18 PM EST

+17176291559

Do they rescind everything when we make payment to him?

11/19/24 4:22:19 PM EST

no. it's a bill of sale for \$2.6M.

11/19/24 4:22:41 PM EST

+17176291559

The release document supposed to do that

11/19/24 4:23:20 PM EST

ok. looks like he just sent another email doc

11/19/24 4:23:24 PM EST

you really need to read

11/19/24 4:23:49 PM EST

+17176291559

I will, but I'm on the road and I'm gonna pull over shortly. You also need to read it.

11/19/24 4:24:00 PM EST

i am reading now

11/19/24 4:30:49 PM EST

john Barnard wants to take our original closing docs — swap the party names and with correct purchase amount and just sign that. Any reason why we can't do that?

11/19/24 4:33:20 PM EST

do you have an attorney looking at these docs?

11/19/24 4:33:35 PM EST

+17176291559

➔ Replying to you, 2024-11-19 16:30:49: « john Barnard wants to take our original closing docs — swap the party names and with correct purchas... »

Perfect! I was just starting to get into the other agreements, but I'm trying to deal with the investor issue and I have no time for it. Can you take care of it?

11/19/24 4:34:05 PM EST

yes.

11/19/24 4:36:09 PM EST

are we using any counsel to review these docs?

11/19/24 4:44:59 PM EST

+17176291559

I don't think we have time. I just sent it back with comments.



11/19/24 4:49:42 PM EST

your comments didn't go through

11/19/24 5:15:13 PM EST

did you sign and return the non compete and Amended bill of sale?

11/19/24 5:16:27 PM EST

that's what they need to cancel the hearing tomorrow

11/19/24 5:32:53 PM EST

Daryl, you need to sign non compete so they can cancel the hearing.

11/19/24 5:32:57 PM EST

see the latest email

11/19/24 5:38:15 PM EST

+17176291559

I've talked to them. They're putting everything in DocuSign.

11/19/24 5:38:22 PM EST

ok

11/19/24 5:38:55 PM EST

i have dennis legal reviewing the settlement. we have redlines now. I will send momentarily

11/19/24 5:42:13 PM EST

+17176291559

So don't sign?

11/19/24 5:42:18 PM EST

corect.

11/19/24 5:42:33 PM EST

I signed the non compete and sent it back

11/19/24 5:42:46 PM EST

+17176291559

Can I send the bill of sale?

11/19/24 5:42:51 PM EST

+17176291559

That's all they want signed

11/19/24 5:43:04 PM EST

yes. I didn't have them review that

11/19/24 5:47:39 PM EST

did you sign both the bill of sale and non compete?

11/19/24 6:00:09 PM EST

hello? did you sign both of the docs?

11/19/24 6:00:16 PM EST

bill of sale and non compete

11/19/24 6:00:18 PM EST

+17176291559

Yea

11/19/24 6:00:21 PM EST

cool.

11/19/24 6:00:29 PM EST

I just sent legal redline for the release doc to them

11/19/24 6:12:36 PM EST

Investor closing tomorrow?

11/19/24 6:12:50 PM EST

Hearing is getting withdrawn in the morning.

11/19/24 6:13:28 PM EST

+17176291559

This is what I sent out to people at 3:30. Once this gets confirmed that it goes back to the buyers. There's no way they're executing tomorrow. We also need that release document.

11/19/24 6:13:32 PM EST

+17176291559

Summary bullet points of current reality as of November 19, 2024, at 330pm EDT

- We were advised by buyers/partners counsel yesterday morning (Monday, November 18th) that Superior ATMs had quietly scheduled a hearing for receivership of Paramount for 830am on November 20th in front of a friendly judge in Michigan
- We immediately engaged Chris Yatooma who is the owner of Superior ATMs given he had communicated a week prior to us that he was deferring any further legal action given we had agreed to a settlement number and timing. Additionally, we were also providing him his ATMs as backup security until our financial settlement at which point he would release such
- We have spent the past 2 days trying to get him to cancel the hearing and while there are soft commitments to do such, hearing is still not cancelled for tomorrow morning. We have also been waiting on documents from him that would provide a release in exchange for the financial settlement we agreed to
- None of our buyers/partners will execute on any settlement/funding for Prestige or Paramount until Superior cancels the receivership hearing of Paramount, removes Paramount garnishments, and signs the full release documents/satisfaction of judgements. Accordingly, investor payments cannot occur until this takes place
- We have essentially lost two full days of processing time, and even if they sign later today it will take another day for payment of funds, review of documents, and the processing of funding

We will keep you posted as we are working this with extreme urgency.

11/19/24 6:15:43 PM EST

Thanks! Best guess is Friday?

11/19/24 6:24:29 PM EST

Am I free to share this with others at work?

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

11/19/24 6:29:01 PM EST

+17176291559

Confidentially

11/19/24 6:29:07 PM EST

+17176291559

Liked "Thanks! Best guess is Friday?"

11/19/24 6:30:26 PM EST

Yep. Steve and Brandon

11/19/24 6:31:47 PM EST

+17176291559

I'm at dinner meeting. I tried John 30 minutes ago, but did not get them.  
Can you try him again?

11/19/24 6:32:23 PM EST

Yes. What are you wanting to talk to him about?

11/19/24 6:33:21 PM EST

+17176291559

Confirming he's good to make the wire tomorrow

11/19/24 6:33:27 PM EST

+17176291559

And that he will sign the document

11/19/24 6:33:36 PM EST

Ok

11/19/24 6:33:36 PM EST

+17176291559

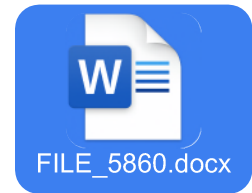
And that he has the APA ready to execute

11/19/24 6:44:13 PM EST

+17176291559

Send me the redline legal sent back

11/19/24 6:44:56 PM EST



11/19/24 6:45:04 PM EST

If you want to see the red line, the email is in your inbox

11/19/24 6:45:17 PM EST

From me

11/19/24 7:06:38 PM EST

I just spoke to John Barnard, I'm gonna need to modify that APA document his attorney is not available. I will work on that tonight. He is ready to fund. He said he's gonna look at the release document and get ready to sign that as well.

11/19/24 7:26:23 PM EST

+17176291559

Liked "I just spoke to John Barnard, I'm gonna need to mo..."

11/19/24 8:19:01 PM EST

FYI — Frank only delayed the hearing until November 27. He didn't cancel it.

11/20/24 7:50:24 AM EST

if John Barnard doesn't come through on payment, Phonco is turned over to Chris and we are released regardless?

11/20/24 7:57:10 AM EST

Daryl, we are desperate for at least \$50k today. Can you send to us? We need to pay Clatworthy and Cash Insurance bill or both stop today

11/20/24 8:32:40 AM EST

Daryl, when you are talking to Barnard — he needs to know that if we are not funded by cut off today, the book is going to be turned over to Chris. I suspect he will drag his feet on this.

11/20/24 8:35:13 AM EST

I've already communicated that we don't want to turn it over to Chris, but we have no choice.

11/20/24 8:37:20 AM EST

+17176291559

➔ Replying to you, 2024-11-20 08:32:40: « Daryl, when you are talking to Barnard — he needs to know that if we are not funded by cut off today... »

Did he get the asset purchase agreement? Has he talked to you this morning? Please call him and push him. I think we have until tomorrow to pull it off with him, correct? I asked for the date to be changed to Thursday.

11/20/24 8:37:44 AM EST

+17176291559

➔ Replying to you, 2024-11-20 07:57:10: « Daryl, we are desperate for at least \$50k today. Can you send to us? We need to pay Clatworthy and Cas... »

Randall, I'm trying to get Chris to release the accounts

11/20/24 8:37:53 AM EST (Edited 11/20/24 8:38:50 AM EST)

the reality is that we need this done today so we can hold investor closing on Friday.

Edited

11/20/24 8:37:57 AM EST

yes, I sent to him last night.

11/20/24 8:40:14 AM EST

Chris is demanding payment today from what I see in the latest document. He did not alter the date.

11/20/24 8:41:07 AM EST

to be clear, if John doesn't come through, we get released regardless?

11/20/24 8:43:58 AM EST

+17176291559

Yes that is my understanding

11/20/24 8:44:30 AM EST

+17176291559

We need to alter the date. Jon needs to whine and say he needs him till tomorrow. Please please ask Jon to respond to that email and say given he did not get it until late yesterday. He needs until tomorrow. Please push John as I'm in the middle of the investor issue. We need him to sign his documents and take care of it.

11/20/24 10:53:47 AM EST

please see email that I just sent to you for letter of understanding.

11/20/24 10:58:09 AM EST

John is now angling that he is just going to pay Chris and take over the book without additional compensation to us. His rationale is asking why he needs to pay more than Chris is paying if Chris is going to just take over the book in lieu of \$3.6M if he doesn't pay? I didn't respond to that I pretended I didn't hear the comment and told him that I have a letter of understanding coming through for him to review and sign.

11/20/24 10:59:43 AM EST

+17176291559

That will absolutely not work

11/20/24 11:00:18 AM EST

+17176291559

Krys would only take it over for an interim period as we would have a buyout for 3.6 million

11/20/24 11:00:45 AM EST

Oh. I wasn't aware of that.

11/20/24 11:01:18 AM EST

Chris told John that ownership of the book passes over to Chris and Chris is free to sell to whomever he wants to so he's free to cut a deal directly with John. That's at least the way John understood it

11/20/24 11:01:53 AM EST

John called Chris this morning to tell him that he's got the cash and he's ready to make a payment

11/20/24 11:11:47 AM EST

Don't call John on this as he asked me to maintain confidentiality on it until he has a chance to think about it more

11/20/24 11:12:18 AM EST

But I don't know how to counter this other than to say that we are going to be maintaining relationships for him moving forward. I need something for that but it's gonna be hard pressed to justify an additional 1.4 million for that purpose.

11/20/24 12:16:26 PM EST

big problem with Superior. Need to talk to you asap.

11/20/24 12:19:52 PM EST

dennis and my legal counsel says that the agreement we have don't fix our problem. 1. if Barnard pays \$3.6M, the terminals that were assigned to Superior are NOT transferred to him. 2. If Barnard doesn't pay, then you owe \$6M and Dennis and I owe \$2.6M and we don't get the terminals back either.

11/20/24 12:20:19 PM EST

we are fucked either way.

11/20/24 12:22:42 PM EST

Daryl wasn't Gierasch helping on these agreements?

11/20/24 12:24:43 PM EST

+17176291559

On with legal. That is not understanding. They fully release. Call Chris and frank and get clear.

They were clear see my emails with notes. We may want to make it more clear but it's there.

11/20/24 12:25:10 PM EST

our legal is saying that what the documents say are what I outlined to you above.

11/20/24 12:25:35 PM EST

+17176291559

Call them.



Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

11/20/24 12:25:41 PM EST

+17176291559

M dealing with investor issue

11/20/24 12:25:52 PM EST

yes. they fully release but they DO NOT transfer the terminals to either party. They stay with Chris.

11/20/24 12:25:55 PM EST

+17176291559

That is not there understanding

11/20/24 12:26:09 PM EST

+17176291559

They have to or no deal. Call frank

11/20/24 12:26:20 PM EST

+17176291559

Needs to be written better

11/20/24 12:26:31 PM EST

I'm going to email them as I want everything in writing.

11/20/24 2:33:50 PM EST

John is not willing to do more than \$3.6M at this time.

11/20/24 2:38:48 PM EST

hang on — I'm on with him.

11/20/24 2:38:57 PM EST

he said that but didn't hold to that.

11/20/24 2:44:52 PM EST

+17176291559

You need to tell him this is discounted from what would be an eight to \$9 million sale in the open market.

11/20/24 2:45:38 PM EST

right, i'm trying

11/20/24 2:52:56 PM EST

he's going to pay \$1M

11/20/24 2:58:58 PM EST

+17176291559

Liked "he's going to pay \$1M"

11/20/24 2:59:19 PM EST

+17176291559

Need to redlines you sent to Chris on release last night. Can you quickly forward?

11/20/24 3:03:44 PM EST

in your inbox

11/20/24 3:04:03 PM EST

i have sasha working on updating language for current release document.

11/20/24 3:06:55 PM EST

i think i have doc acceptable to Barnard in your inbox.

11/20/24 4:18:19 PM EST

What's happening with document coming from superior?

11/20/24 4:19:01 PM EST

+17176291559

I think it's en route

11/20/24 4:19:12 PM EST

+17176291559

I just saw it hit. Is that exactly what you requested?

11/20/24 4:19:17 PM EST

Got it

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

11/20/24 4:19:19 PM EST

Looking

11/20/24 4:20:07 PM EST

yep. all good

11/20/24 4:20:29 PM EST

you signing?

11/20/24 4:21:02 PM EST

i signed

11/20/24 4:27:38 PM EST

+17176291559

Same

11/21/24 9:48:24 AM EST

please see email from Joe Roselius DLA Piper

11/21/24 9:48:30 AM EST

I don't know what this means

11/21/24 9:49:50 AM EST

+17176291559

Yes, it's just being filed until the funding occurs

11/21/24 9:49:54 AM EST

ok

11/21/24 9:50:07 AM EST

+17176291559

When I get time, I'll get you more info

11/21/24 9:50:14 AM EST

ok/

11/21/24 9:50:20 AM EST

+17176291559

Who is putting the request into Kris for the changes? We need to get those done ASAP.

11/21/24 9:50:51 AM EST

I was thinking you were

11/21/24 9:51:18 AM EST

+17176291559

No, I think they'll be way better if they come from you or John

11/21/24 9:51:34 AM EST

that can't come from John but I will send to Chris.

11/21/24 11:19:48 AM EST

need to bring you on with John. he's getting cold feet.

11/21/24 11:26:16 AM EST

you available now?

11/21/24 11:27:07 AM EST

+17176291559

Two minutes

11/21/24 11:38:14 AM EST

it is only a few terminals. he is exaggerating to make a point.

11/21/24 11:38:30 AM EST

+17176291559

Liked "it is only a few terminals. he is exaggerating to ..."

11/21/24 12:04:05 PM EST

i think this is about the holdback

11/21/24 12:04:13 PM EST

he's trying to squeeze us for this.

11/21/24 12:08:29 PM EST

this is the point.

11/21/24 12:08:36 PM EST

of all of this.

11/21/24 12:16:30 PM EST

Jonathan Weis <jweis@levingsburg.com>

11/21/24 12:22:45 PM EST

+17176291559

Did you send?

11/21/24 12:23:03 PM EST

yes

11/21/24 12:25:56 PM EST

I guess there is no way to get 3.6M from anyone else today?

11/21/24 12:26:03 PM EST

In an emergency?

11/21/24 12:36:22 PM EST (Edited 11/21/24 12:37:21 PM EST)

See new emails from DL piper looks like they filed in court today

Edited

11/21/24 1:08:35 PM EST

+17176291559

I can't find the serial numbers we sent to Chris cross reference. Do you have that spreadsheet?

11/21/24 1:08:50 PM EST

+17176291559

We gave a preliminary list with placeholder so we can change them if there is duplicates. We are safe there.

11/21/24 1:42:07 PM EST

[https://lancasteronline.com/business/local\\_business/owner-of-lancaster-based-atm-network-hit-with-138m-judgment-after-missing-another-deadline-to/article\\_9678f230-a825-11ef-bf2e-77959af5a3b4.html](https://lancasteronline.com/business/local_business/owner-of-lancaster-based-atm-network-hit-with-138m-judgment-after-missing-another-deadline-to/article_9678f230-a825-11ef-bf2e-77959af5a3b4.html)

11/21/24 1:42:58 PM EST

+17176291559

Is it a bad article? I'm presenting on a call

11/21/24 1:49:15 PM EST

Daryl Heller and his Lancaster-based ATM network have been hit with a \$138 million judgment that also forces him to surrender control of his company's estimated 25,000 ATMs after he missed a Wednesday deadline for final buyout payments to nearly 2,700 investors. In addition to requiring the massive payment, the judgment entered this morning in Lancaster County Court of Common Pleas gives Heller seven days to transfer all of his ATMs to the investors. Heller signed off on the terms of the judgment in a court-approved stipulation that was entered last week ([https://lancasteronline.com/business/local\\_business/new-conditions-set-as-deadline-pushed-back-for-buyouts-of-investors-in-lancaster-based-atm/article\\_ac89c14c-a2d2-11ef-b4cb-572928971958.html](https://lancasteronline.com/business/local_business/new-conditions-set-as-deadline-pushed-back-for-buyouts-of-investors-in-lancaster-based-atm/article_ac89c14c-a2d2-11ef-b4cb-572928971958.html)) and spelled out the consequences for missing Wednesday's deadline. He did not immediately respond to a request for comment.

11/21/24 1:49:31 PM EST

Steve's phone is blowing as is mine. what do we tell them?

11/21/24 1:49:42 PM EST

blowing up as is mine.

11/21/24 1:49:46 PM EST

what's the story?

11/21/24 1:49:53 PM EST

or response we should give them?

11/21/24 1:55:24 PM EST

need a response asap please!

11/21/24 1:58:22 PM EST

+17176291559

Our legal has had multiple discourses with their legal. Given the have a class action lawsuits being filed against them (Fund managers) not me they had to file this out of fiduciary. They know they cant take over ATMs (assignments of locations agreements, etc) and will take our payment as soon as Superior is settled. WE have another strategy call with them at 4pm and I am on with them now.

Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.net, +17179175670, randall.leanman@paramountmgp.com, +17179172753

11/21/24 1:59:09 PM EST

so this his just a formality and the original deal is not off?

11/21/24 2:00:31 PM EST

when are you planning to pay?

11/21/24 2:01:10 PM EST

+17176291559

At some level I almost feel like turning th elucidations over to them and ATMs in warehouses and taking down to small universe, or bringing you inside of Margo or heller to run it.

11/21/24 2:01:18 PM EST

+17176291559

➔ Replying to you, 2024-11-21 13:59:09: « so this his just a formality and the original deal is not off? »

100%

11/21/24 2:02:22 PM EST

for clarity — none of the Barnard locations are ordered by the court to turn over?

11/21/24 2:04:22 PM EST

please answer this as I can't do this deal with John in good conscience

11/21/24 2:05:17 PM EST

+17176291559

That is correct. I need the location sent to me, but I'm pretty confident Not If there's a few they would be placeholders and removed.

11/21/24 2:06:11 PM EST

just emailed to you

11/21/24 2:06:32 PM EST

+17176291559

Is John going to do this deal?

11/21/24 2:06:45 PM EST

yes. but I don't feel good about it with this news.

11/21/24 2:07:31 PM EST

+17176291559

We will ensure there is no crossover

11/21/24 2:07:40 PM EST

ok

11/21/24 2:07:58 PM EST

+17176291559

It sounds like what Bria has it not accurate either.

11/21/24 2:08:10 PM EST

correct. but minimally

11/21/24 2:09:16 PM EST

+17176291559

Chris has

11/21/24 2:09:22 PM EST

right

11/21/24 2:09:52 PM EST

Steve, is saying that investors are taking over. Jeffery Keith has been lined up. Sabah called Steve as well.

11/21/24 2:10:41 PM EST

Chris yatooma also told them this also

11/21/24 2:11:21 PM EST

I can't ask John Barnard to do this.

11/21/24 2:11:34 PM EST

i know it is going to ruin me financially

11/21/24 2:12:57 PM EST

it feels like that this is over



11/21/24 2:13:00 PM EST

+17176291559

Randall, that is not the case. We can validate John's ATMs are not part of it. Beyond that the Krys deal will resolve everything else.

11/21/24 2:13:28 PM EST

but the judgement is for everything?

11/21/24 2:14:29 PM EST

i must share this article with him

11/21/24 2:16:30 PM EST

+17176291559

It is not

11/21/24 2:16:43 PM EST

+17176291559

I will get you information from legal as soon as I can

11/21/24 2:16:53 PM EST

i need it now.

11/21/24 2:17:05 PM EST

+17176291559

If you want to share it with him, you can, but I don't think it's relevant

11/21/24 2:17:18 PM EST

are you on a call?

11/21/24 2:17:23 PM EST

+17176291559

Yes

11/21/24 2:17:27 PM EST

+17176291559

W them

11/21/24 2:17:40 PM EST

+17176291559

Superior makes this go away

11/21/24 2:18:14 PM EST

+17176291559

If you want me to give you some personal rep to protect you, I can

11/21/24 2:18:24 PM EST

that's not it.

11/21/24 2:20:40 PM EST

i'm going to tell him just to do the \$3.6M and holdback the rest until this blows over

11/21/24 2:21:21 PM EST

+17176291559

K

11/21/24 2:21:50 PM EST

+17176291559

I'll get documentation on everything. I would tell him you want the additional million by Monday. I will then work on a package of information to validate for him.

11/21/24 2:22:10 PM EST

ok

11/21/24 2:35:11 PM EST

going to have you sign our agreement with John barnard

11/21/24 2:35:28 PM EST

I talked to John about this. he is still moving forward.

11/21/24 2:35:41 PM EST

look for a docusign from Rose

11/21/24 2:36:22 PM EST

did you sign docusign for Chris?

11/21/24 2:45:50 PM EST

you need to docusign chris document!

11/21/24 2:45:59 PM EST

DARYL, please sign!

11/21/24 2:47:10 PM EST

i am having Rose sign for you

11/21/24 2:48:51 PM EST

+17176291559

I signed

11/21/24 2:49:00 PM EST

cool

11/21/24 3:16:06 PM EST

+17176291559

Can I meet with you tomorrow afternoon so I can bring you some comfort?

11/21/24 3:16:18 PM EST

yes any time

11/21/24 3:16:40 PM EST

+17176291559

Drinks later in the day

11/21/24 3:18:35 PM EST

yes.

11/21/24 3:20:15 PM EST

I need something to send to all employees. They are completely freaking out now

11/21/24 3:27:28 PM EST

To all employees:

Following is our response to the article in the local newspaper:

- 1 The Michigan lawsuit that caused the delay in the investor funding has been resolved today.
- 2 Heller Capital is moving forward with the investors to pay them according to the agreement.
- 3 As a result, there is going to be no change in ownership/ leadership of Paramount.

11/21/24 3:27:37 PM EST

is this accurate?

11/21/24 3:33:52 PM EST

Daryl?

11/21/24 3:57:11 PM EST

+17176291559

I'm on a call I'm driving. Can I have 10 minutes to pull over and read it?

11/21/24 3:57:17 PM EST

Yes

11/21/24 4:08:43 PM EST

+17176291559

➔ Replying to you, 2024-11-21 15:27:37: « is this accurate? »

Yes. But of make these changes.

11/21/24 4:10:18 PM EST

?

11/21/24 4:11:08 PM EST

what changes?

11/21/24 4:12:50 PM EST

+17176291559

To all employees:

Following is our response to the article in the local newspaper:

1 The Michigan lawsuit that caused the delay in the investor funding has been resolved today. We were only made aware of the action they were taking on Monday morning, which delayed all the events this week

2 Heller Capital and affiliates are moving forward with the investors to pay them according to the agreement upon execution enclosure of superior

3 As a result, there should be no change in ownership/ leadership of Paramount. The judgment had to be filed by the fund managers until settlement payments occur.

11/21/24 4:16:41 PM EST

execution enclosure of superior — what does this mean?

11/21/24 4:20:00 PM EST

+17176291559

Execution enclosure

11/21/24 4:20:21 PM EST

execution and closure?

11/21/24 4:21:15 PM EST

+17176291559

Yes

11/21/24 9:03:24 PM EST

Investor Closing tomorrow?

11/21/24 9:27:28 PM EST

+17176291559

Definitely not. We don't even have confirmation wires in yet. It's gonna be two business days from that given the international wire.

11/21/24 9:27:58 PM EST

Liked "Definitely not. We don't even have confirmation wi..."

11/22/24 7:50:11 AM EST

+17176291559

Good morning. I don't think you should keep any cash in FNB. They're gonna take the money that's there, I fear

11/22/24 7:50:50 AM EST

+17176291559

You noted 500 K from John versus 1 million. Is that 500 K coming today and the 1.1m deferred?

11/22/24 7:50:51 AM EST

not sure how we leave cash there to cover outstanding checks.

11/22/24 7:51:04 AM EST

+17176291559

What are the amounts of checks?

11/22/24 7:51:21 AM EST

no. \$500k is coming when we can prove there is no attachment of these terminals to the investor program.

11/22/24 7:51:21 AM EST

+17176291559

He should advise that there's checks coming in against that

11/22/24 7:51:34 AM EST

+17176291559

When is the 1.1 million coming?

11/22/24 7:52:11 AM EST

- a. Buyer will hold back \$500,000 until seller provides evidence that assets are free and clear of any liens.
- b. Buyer will hold back \$900,000 until 5/20/25

11/22/24 7:53:03 AM EST

+17176291559

I did not know the deal got restructured at that level. I knew we were deferring on the front side for a day or two.

11/22/24 7:54:21 AM EST

the last we had discussed, it was \$1M at settlement. Given John's last minute push, I thought we agreed to reduce it to \$500k. Then when the article came out, I deferred this.

11/22/24 8:00:11 AM EST

can we provide evidence that there are no liens against phonco terminals?

11/22/24 8:32:18 AM EST

➔ 2024-11-21 15:16:06: « Can I meet with you tomorrow afternoon so I can bring you some comfort? »

what time works for you?

11/22/24 9:46:07 AM EST

From Steve Gernes:

11/22/24 9:46:09 AM EST

Apparently this verbiage was sent out to investors by attorney memo yesterday.

"While the likelihood that Paramount will obtain the financing necessary to effectuate a buyout appears remote, if Paramount does obtain the resources necessary to complete the investor buyout, the fund managers will consider proceeding with a transaction while weighing all of the risks to the funds and investors,"

11/22/24 9:47:41 AM EST

How do I respond?

11/22/24 10:09:52 AM EST

everyone is asking for timing of payment to the investors. Can you give me a date so I can let everyone know?

11/22/24 10:09:59 AM EST

Paramount employees

11/22/24 11:26:46 AM EST

can you get us \$50k today so we can pay Clatworthy?

11/22/24 11:28:50 AM EST

+17176291559

Do you have confirmation that John's wire was received by Chris? I need that.

11/22/24 11:29:29 AM EST

yes email to you last night from Chris

11/22/24 11:29:30 AM EST

I got a text from my banker at 7:20 that the wire hit the bank and will post to my account in the morning....ww start working on getting everything rescinded in the morning.

Frank, call me in the morning to discuss. Thanks.

On Nov 21, 2024, at 7:05 PM, Randall Leaman <randall.leaman@paramountmgp.com (mailto:randall.leaman@paramountmgp.com)> wrote:

Thanks Chris, I received verbal confirmation from John about 6:30 when he confirmed with Fidelity that it was released to you

Randall Leaman  
CEO  
Randall.leaman@paramountmgp.com (mailto:Randall.leaman@paramountmgp.com)

Creating and Cultivating a Culture of  
P.E.A.C.E. ([https://urldefense.proofpoint.com/v2/url?u=https-3A\\_\\_paramountmgp.com\\_our-2Dvalues\\_&d=DwMGaQ&c=euGZstcaTDIlvimEN8b7jXrwqOf-v5A\\_CdpnVfiiMM&r=vmwJR2pZMs7oVOpZWsvJoxQmxIPRLF-c00iXHN25Tuk&m=VrbSrWGNzPbxKLa\\_9\\_6yd3qVdX2vUI6ssMYzcivxHOd8nkwxkMan4BG-u4QdF7J6t&s=eW7FtDkVM2SCgCUmiXvSMr18QG2TOzDcXc-Fbr7jiK8&e=](https://urldefense.proofpoint.com/v2/url?u=https-3A__paramountmgp.com_our-2Dvalues_&d=DwMGaQ&c=euGZstcaTDIlvimEN8b7jXrwqOf-v5A_CdpnVfiiMM&r=vmwJR2pZMs7oVOpZWsvJoxQmxIPRLF-c00iXHN25Tuk&m=VrbSrWGNzPbxKLa_9_6yd3qVdX2vUI6ssMYzcivxHOd8nkwxkMan4BG-u4QdF7J6t&s=eW7FtDkVM2SCgCUmiXvSMr18QG2TOzDcXc-Fbr7jiK8&e=)))

11/22/24 12:09:01 PM EST

+17176291559

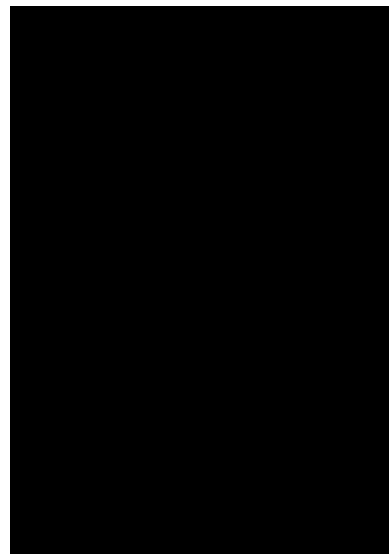
I hit Kris twice. I desperately need this to work the backend of the investor side. He still not confirmed the wire hit. Do you have an iMAP number from John ?

11/22/24 12:10:23 PM EST

Asking.



11/22/24 12:23:43 PM EST



11/22/24 12:24:08 PM EST

is this what you need?

11/22/24 1:19:52 PM EST

+17176291559

Has Krys confirmed whether it hit the account?

11/22/24 1:20:00 PM EST

+17176291559

I just need confirmation that the releases are valid

11/22/24 1:20:06 PM EST

+17176291559

I called Krys and he said text him. I text him and he hasn't responded.

11/22/24 1:20:07 PM EST

he has not responded to my email

11/22/24 1:20:10 PM EST

+17176291559

Have you heard from him?

Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.  
net, +17179175670, randall.leanman@paramountmgp.com, +17179172753

11/22/24 1:20:13 PM EST

+17176291559

Ok

11/22/24 1:20:15 PM EST

no.

11/22/24 1:20:29 PM EST

he responded last night that he received it on the email he sent to us

11/22/24 1:21:09 PM EST

+17176291559

He received wire?

11/22/24 1:21:14 PM EST

see your inbox now

11/22/24 1:21:14 PM EST

+17176291559

Sorry I missed that

11/22/24 1:21:21 PM EST

just sent to you

11/22/24 1:21:22 PM EST

yes.

11/22/24 1:25:03 PM EST

any chance you can wire \$50k to us? want to pay Clatworthy — afraid  
article will spook them

11/22/24 1:58:34 PM EST

Clatworthy is calling me. I'm sure he saw the article. Will you please call  
him asap?

11/22/24 2:00:12 PM EST

he's been asking you to speak to him for the past several weeks and I  
think he needs to hear from you

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

11/22/24 2:00:18 PM EST

especially in light of this.

11/22/24 2:05:56 PM EST

please?

11/22/24 2:09:25 PM EST

+17176291559

I've chatted with him multiple times. I'm literally working to get this investor thing resolved. I was typing up an explicit email for him. I will then offer a call in the backend of that.

11/22/24 2:09:37 PM EST

cool. thanks.

11/22/24 3:20:05 PM EST

Cash Connect Stop funding was implemented today

11/22/24 3:48:04 PM EST

meeting for drinks today?

11/22/24 4:00:07 PM EST

+17176291559

Questioned "Cash Connect Stop funding was implemented today"

11/22/24 4:00:14 PM EST

+17176291559

I sent him email. Will call him

11/22/24 4:00:35 PM EST

+17176291559

➔ Replying to you, 2024-11-22 15:48:04: « meeting for drinks today? »

I still don't have confirmation of garnish releases. Did they come off your account?

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

11/22/24 4:00:42 PM EST

+17176291559

➔ Replying to you, 2024-11-22 15:48:04: « meeting for drinks today? »

Still in Heller capital.

11/22/24 4:00:46 PM EST

Not yet

11/22/24 4:00:51 PM EST

+17176291559

➔ Replying to you, 2024-11-22 15:48:04: « meeting for drinks today? »

This is the final piece I need

11/22/24 4:01:21 PM EST

Dennis has been in communication with Chris and Chris said they are releasing.

11/22/24 4:01:26 PM EST

+17176291559

I need to stay on this for vakieput with Funders

11/22/24 4:01:37 PM EST

Liked "I need to stay on this for vakieput with Funders "

11/22/24 4:11:50 PM EST

see Torosian email

11/22/24 4:41:35 PM EST

Daryl, you may want to clarify with Torosian if documents are due tomorrow (November 23) or December 23. Nathan Heller's email says that they are due December 23.

11/22/24 4:42:08 PM EST

Daryl and Randall,

In addition to the consent judgment documents that Joe provided earlier, we received the attached interrogatories directed to Paramount this afternoon seeking information in connection with enforcement of the judgment. The deadline to respond is December 23rd.

Best,

Nate

Nathan P. Heller  
Of Counsel

11/22/24 4:47:10 PM EST

+17176291559

I set up a text to him and spoke to him briefly. We really don't need him anymore.

11/22/24 4:47:49 PM EST

Ok

11/23/24 9:41:09 AM EST

Mr. Leaman:

Pursuant to Section 21 of the Bailment Agreement ("Agreement") dated effective March 18, 2013, by and between Wilmington Savings Fund Society and its division Cash Connect (collectively, the "Bank") and Paramount Management Group, LLC, we hereby are serving notice of default for failure to pay past due balances due Bank. We hereby demand payment of all receivables totaling \$1,980,493.75. We have stopped all funding of your ATMs and have directed all armored carriers to immediately retrieve and deliver Vault Cash to Bank. Your full support of this demanded cash recall with all armored carriers and network processors is required under our Agreement.

11/23/24 9:41:17 AM EST

Just got this email from John Clatworthy are shutting us off for good we don't

11/23/24 9:41:20 AM EST

Pay

11/23/24 9:41:24 AM EST

\$2 million

11/23/24 9:42:34 AM EST (Edited 11/23/24 9:42:52 AM EST)

They are defunding us today

Edited

11/23/24 9:58:42 AM EST

+17176291559

Taite is back from college and at breakfast w her and then wedding. iMessage him at like 8 AM this morning asking when he can talk. Apparently he call me back but I was on do not disturb because I'm with Taite. I just messaged him and asked to talk this afternoon. I'll get to you as soon as I talk to him.

11/23/24 9:59:42 AM EST

Just so you know, it looks like they shut us down for good they've given orders. Everybody knows that they're pulling the cash out of the machine. That's what Tommy and Joe are hitting us on right now so this is a utmost urgency.

11/23/24 10:00:27 AM EST

+17176291559

Did not see Tommy message. They told Tommy they're taking the cash from machines?

11/23/24 10:02:10 AM EST

Yes. They gave orders to remove all cash. Armored could be on its way now for all I know. This is critical

11/23/24 10:02:47 AM EST

It's probably out of John's hands. They probably saw the article

11/23/24 10:03:51 AM EST

You need to speak with John now. It can't wait.

11/23/24 10:05:30 AM EST

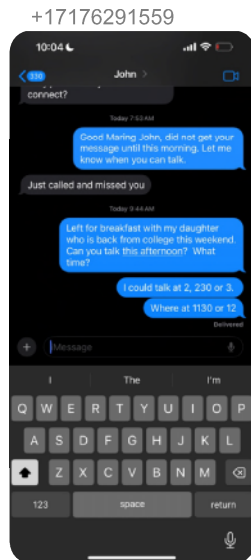
+17176291559

I sent him email yesterday that I copied you on

Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

11/23/24 10:05:39 AM EST



11/23/24 10:05:53 AM EST

I'm sure that's what triggered this

11/23/24 10:06:33 AM EST

I saw the email you sent yesterday. I think because we didn't pay them as we had agreed to they're done and it may be too late.

11/23/24 10:06:56 AM EST

+17176291559

How much were they wanting from us this week?

11/23/24 10:07:12 AM EST

+17176291559

Hella capital my personal accounts were frozen by Chris so we had no money. I did not want to say it in that matter to him.

11/23/24 10:07:41 AM EST

+17176291559

How much did we pay him this week?

11/23/24 10:07:46 AM EST

We owed him 70,000 at least 35,000 yesterday

11/23/24 10:08:30 AM EST

We only paid him 3 out of 5 days this week

11/23/24 10:08:41 AM EST

We missed Monday and Friday

11/23/24 10:11:15 AM EST

+17176291559

Talking at 1130

11/23/24 10:36:13 AM EST

You probably wanna talk sooner than 11:30.

11/23/24 10:37:02 AM EST

+17176291559

Offered 11

11/23/24 10:37:19 AM EST

Ok

11/23/24 10:37:19 AM EST

+17176291559

Could we ask to move under a contract like David Charles has with CC connect. He's been reaching out to me nonstop.

11/23/24 10:38:05 AM EST

Maybe I'm not sure if Cash Connect will allow that knowing what they know about us

11/23/24 10:39:50 AM EST

+17176291559

Is the 1.9 million what we owe for the last couple months?

11/23/24 10:40:09 AM EST

That's probably getting us current with them

11/23/24 10:40:25 AM EST

My guess is they're more worried about the 138 judgment against us



11/23/24 10:40:36 AM EST

138m judgement

11/23/24 10:40:52 AM EST

My guess is the board of the bank met and made this decision. It may be too late to undo it.

11/23/24 10:44:11 AM EST

I think we need to tell them that we will get them current by X date 100% guaranteed and need to explain what's going on with the investors and when they're getting paid off in this getting freed up, I think those are the only two things that could potentially save us

11/23/24 10:44:29 AM EST

Think you need to show them that you have funds available to do it

11/23/24 10:45:05 AM EST

And that the investors have agreed to accept whatever the amount is which is not 138 million

11/23/24 10:45:21 AM EST

Otherwise, they're gonna move to mitigate their risk now, which they can do

11/23/24 10:45:38 AM EST (Edited 11/23/24 10:45:55 AM EST)

So I would get any doc you can to them ASAP to show that this is under control

Edited

11/23/24 10:46:33 AM EST

I don't think they're going to accept your word for it

11/23/24 10:46:46 AM EST

+17176291559

I can send them redacted purchase agreements, etc., which the attorneys on the other side received

11/23/24 10:46:46 AM EST

They will need to see evidence

11/23/24 10:47:09 AM EST

Yes, whatever you can send them to show them that this is done finalized and over is what they're gonna need to see. Otherwise they're just gonna move forward.

11/23/24 10:47:23 AM EST

They're probably also going to see funding commitments

11/23/24 10:48:06 AM EST

So you need to show them that's less than 138 million or whatever the number is and that you've got funding lined up and ready to go to satisfy that and more so that we can pay them back there \$2 million

11/23/24 10:48:10 AM EST

+17176291559

I offered 11 but he hasn't responded. I have a wedding today as well, but I'll take care of this as priority

11/23/24 10:48:24 AM EST

Yes, we won't have cash in our machines Monday. Probably every armor truck is on its way right now to pull cash out.

11/23/24 10:48:32 AM EST

And it's over if that's the case

11/23/24 10:48:47 AM EST

Just call him

11/23/24 10:49:13 AM EST

+17176291559

He's bringing others on the call as well. He just accepted 11.

11/23/24 10:49:18 AM EST

Ok

11/23/24 10:49:48 AM EST

Just be ready to get evidence in front of them what I said because if you can't convince them through documentation, I don't think they're going to accept what you say versus what they see as filed in court as a judgment.

11/23/24 10:50:00 AM EST

+17176291559

I thought armor takes weeks to get cash

11/23/24 10:50:16 AM EST

Nope, they can be ordered to go out now. I'm assuming not all of it will get pulled out this weekend, but it will be out in a few days.

11/23/24 10:51:10 AM EST

I don't think every army carrier is working over the weekend so we might have a couple of days more but they're all aware of this and they might start doing it today in some cases, but this is gonna make national news as well

11/23/24 10:51:31 AM EST

ATMIA has been publishing articles

11/23/24 10:51:39 AM EST

Everyone will know and probably does by now

11/23/24 10:53:14 AM EST

This is absolutely a matter of Paramount survival

11/23/24 11:02:01 AM EST

+17176291559

They are offering you to be on call. Do you want to join?

11/23/24 11:02:36 AM EST

If it's essential that I'd be on yes but I have nothing to add cause I don't have any information

11/23/24 11:02:48 AM EST

+17176291559

It is audio only. They asked if I wanted you in and I said I'm good with that

11/23/24 11:02:57 AM EST

+17176291559

Ok I'll let them know not available right now

11/23/24 11:03:05 AM EST

Thanks.

11/23/24 11:40:05 AM EST

+17176291559

Im trying to get them to move. Pleading. They are softening a bit. It is suzie (COO) and John.

11/23/24 11:40:22 AM EST

OK

11/23/24 11:40:27 AM EST

+17176291559

They said above their pay grade decision but will go to bat for us

11/23/24 11:40:41 AM EST

Can you talk to them whoever their superiors are

11/23/24 11:40:51 AM EST

+17176291559

They said machines will not be decashed over weekend but I said they already are in NYC

11/23/24 11:41:12 AM EST

+17176291559

I asked, they said they can take back what I can provide them and get quick answers

11/23/24 11:41:22 AM EST

+17176291559

They have 70M at risk they are saying

11/23/24 11:41:31 AM EST

Yes, that's probably about right

11/23/24 11:41:43 AM EST

+17176291559

But only 3000 ATMs, does that sound right? Only 3000?

11/23/24 11:42:02 AM EST

Yes, that sounds about right because we have cash with another cash provider for all of our locations that are cannabis locations

11/23/24 11:42:09 AM EST

+17176291559

K

11/23/24 11:42:22 AM EST

+17176291559

And then many private cash loaders

11/23/24 11:42:23 AM EST

But that other cash, Providers a bank and I'm guessing they're gonna feel the same way and reach out to us

11/23/24 11:42:30 AM EST

Correct

11/23/24 11:42:34 AM EST

+17176291559

Do Tommie and joie cash load?

11/23/24 11:42:42 AM EST

No

11/23/24 11:44:34 AM EST

Can you provide them what they're needing to satisfy them?

11/23/24 11:45:36 AM EST

+17176291559

I think but they want things from the fund managers as well.

11/23/24 11:45:39 AM EST

Can you at least buy a week to get the investor payments done, and all this freed up?

11/23/24 11:46:24 AM EST

+17176291559

They are saying they can reload anything Monday that got decashed over the weekend. They dont expect much today and probably nothing tomorrow. I am not sure if they are downplaying it or if that is real

11/23/24 11:46:47 AM EST

+17176291559

I think they were forced to send that letter based on decision made yesterday but waited until today to send

11/23/24 11:47:14 AM EST

If you can provide what they're asking, will they be happy with that? Or do they think they still have a problem?

11/23/24 11:47:36 AM EST

+17176291559

They think it will work but again deferring to other execs

11/23/24 11:47:52 AM EST

+17176291559

Still driving clarity but want this based on what I suggested

11/23/24 11:48:10 AM EST

So what is the next step?

11/23/24 11:48:11 AM EST

+17176291559

1) APA to show dollars available on HIH, HC and Paramount

11/23/24 11:48:23 AM EST

+17176291559

2) Funding managers accepting payoff discount judgement

11/23/24 11:48:31 AM EST

Do you have both of those?

Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

11/23/24 11:48:39 AM EST

+17176291559

3) allocation that we can payoff 1.9M at settlement

11/23/24 11:48:49 AM EST

+17176291559

Payoff dispute judgement

11/23/24 11:49:17 AM EST

+17176291559

Likely can get this though not sure if I can over weekend. Working it now

11/23/24 11:49:29 AM EST (Edited 11/23/24 11:49:41 AM EST)

OK, thanks they're available to work this weekend as well?

Edited

11/23/24 11:50:05 AM EST

My guess is the fund managers of will want to provide this quickly because they do not want to jeopardize the deal

11/23/24 11:50:16 AM EST

+17176291559

I asked if the can get this reversed over the weekend or if it will defer to Monday and their side and they said they can try over weekend if we can get them info but likely Monday morning

11/23/24 11:50:27 AM EST

OK

11/23/24 11:50:37 AM EST

+17176291559

Was there a letter send with email or just email from Susie?

11/23/24 11:50:48 AM EST

+17176291559

What is John title?

11/23/24 11:50:57 AM EST

Just email

11/23/24 11:51:36 AM EST (Edited 11/23/24 11:52:20 AM EST)

So the message I should give to everyone is "Daryl's aware is working on it and can provide them what they need to satisfy them. We expect this to be resolved very quickly."

Edited

11/23/24 11:54:56 AM EST

+17176291559

I think that works

11/23/24 11:55:28 AM EST

+17176291559

Resolved in next day or two may be best and if anything gets decashed they said they can reload on Monday

11/23/24 11:57:37 AM EST

For my ease of mind, do you think investors will be funded and this will be over by Tuesday?

11/23/24 11:58:36 AM EST

Or Wednesday?

11/23/24 12:03:27 PM EST

+17176291559

Wednesday. This could mess it up and we need to get back online Monday.

11/23/24 12:03:35 PM EST

+17176291559

Did they send you actual legal letter or just email

11/23/24 12:03:35 PM EST

Fuck

11/23/24 12:03:41 PM EST

Just email

11/23/24 12:03:50 PM EST

I forwarded to you



11/23/24 12:04:04 PM EST

+17176291559

I only got email

11/23/24 12:04:05 PM EST

+17176291559

Not letter

11/23/24 12:04:13 PM EST

That's all I received too

11/23/24 12:05:04 PM EST

+17176291559

Im sitting here wondering if turning over Paramount would be easiest and have you come in (with a couple key players) and run Margo or another entity for high upside would be best. Not wanting to go that route yet but this is constant battle

11/23/24 12:06:20 PM EST

I'm OK with that. I am just completely freaked out that when they get in and realize that there's not 25,000 locations there and they're not generating the margins that they need that they are going to trip and we're gonna be all in lawsuits and alleging fraud

11/23/24 12:06:58 PM EST

The longer the stretches out the more these things will pop up and will keep fighting this. We just gotta get it closed. They just gotta get it done now. Because more things will show up just tell them we gotta get it done.

11/23/24 12:10:13 PM EST (Edited 11/23/24 12:10:32 PM EST)

This just can't keep going like this Daryl. It's gotta stop now. It's just gonna keep happening like it's happening. One thing after another. We got a dozen vendors who have us on shutdown notice if you hey don't get paid next week

Edited

11/23/24 12:10:52 PM EST

And their armored providers and maintenance providers and communication, communications providers. It's everyone.

11/23/24 12:11:11 PM EST

If they don't close by Wednesday, it's over

11/23/24 12:11:19 PM EST

Because we have no cash and cannot pay bills

11/23/24 12:11:36 PM EST

+17176291559

I still only got email. No letter. Is there a letter attached from Clatworthy?

11/23/24 12:11:43 PM EST

+17176291559

What is Clatworthy title?

11/23/24 12:11:51 PM EST

There is no letter

11/23/24 12:11:54 PM EST

Only an email

11/23/24 12:12:24 PM EST

Looking

11/23/24 12:13:16 PM EST

John Clatworthy  
SVP, Chief Customer and Strategy Officer

11/23/24 12:15:48 PM EST

I'm completely serious that you have to communicate to the fund managers that this is the level of things we are dealing with every time notices go out in the paper about this process and not getting done. It's just got to get done.

11/23/24 12:17:14 PM EST

I literally cannot take this anymore after last week with superior I am not so done. I can't think straight.

11/23/24 12:17:30 PM EST

I'm not sleeping. I'm not eating

11/23/24 12:17:58 PM EST

+17176291559

I know Randall.

11/23/24 12:18:55 PM EST

+17176291559

It needs to end

11/23/24 12:18:55 PM EST

I'm having panic attacks and shaking uncontrollably at times.

11/23/24 12:21:55 PM EST

The only good option I see is the buyout.

11/23/24 12:29:38 PM EST

+17176291559

➔ Replying to you, 2024-11-23 12:18:55: « I'm having panic attacks and shaking uncontrollably at times. »

I'm sorry

11/23/24 12:30:19 PM EST

I'm giving it my best, but I just can't continue

11/23/24 12:50:16 PM EST

I'm sorry, If Clatworthy shuts us down I don't think I can continue.

11/23/24 12:50:37 PM EST

It's just too much for me

11/23/24 12:51:16 PM EST

I'm exhausted

11/23/24 1:11:24 PM EST

+17176291559

I understand. I'm sorry.

11/23/24 1:11:33 PM EST

Loved "I understand. I'm sorry. "

11/23/24 2:59:30 PM EST

Letter was just sent by Audi

11/23/24 2:59:35 PM EST

Suzi

11/23/24 2:59:45 PM EST



11/23/24 3:20:43 PM EST

+17176291559

Information is in front of fun, managers, legal, and going to the fun managers

11/23/24 3:21:00 PM EST

Liked "Information is in front of fun, managers, legal, a..."

11/23/24 8:48:44 PM EST

+17176291559

Courtesy update, waiting for fun managers to provide an email. Their counsel is suggesting they will. Hope to get it late tonight or first thing in the morning.

11/23/24 8:49:15 PM EST

Great. What do you expect to see on this email?

11/23/24 8:50:08 PM EST

+17176291559

1) we agree if we are paid this week that we will be reversing the judgment and not trying to take over any of the ATMs  
2) we also agreed to pay 1.9 million out of the reserve fund upon payment occurring to the funds

Quick simple email

11/23/24 8:50:21 PM EST

+17176291559

I also have a funding document to show them that I'm waiting for approval on

11/23/24 8:50:41 PM EST

Sweet. So why wouldn't they accept this?

11/23/24 8:51:00 PM EST

➔ 2024-11-23 20:50:21: « I also have a funding document to show them that I'm waiting for approval on »

What approval do you need

11/23/24 10:03:35 PM EST

+17176291559

Approval to send it to cash connect

11/23/24 10:03:43 PM EST

+17176291559

Not send back the NDA yet

11/23/24 10:04:10 PM EST

Ok makes sense. Cool. I think this should work.

11/23/24 10:04:25 PM EST

Thank you!

11/23/24 10:06:44 PM EST

And we think this can all take place on Wednesday?

11/24/24 10:59:06 AM EST

Any update on cash connect?

11/24/24 11:18:06 AM EST

+17176291559

Just hung up with fund managers legal. They're going to be sending a message to John shortly.

11/24/24 12:22:35 PM EST

From Gernes

I have reports of multiple atms decashed. across multiple armoreds. I just had a call with my team to discuss identifying impacted atms and messaging to merchants who contact us.

11/24/24 12:25:03 PM EST

+17176291559

John should have all the information he needs shortly

11/24/24 12:25:21 PM EST

OK, cool

11/24/24 1:35:50 PM EST

Everything in their hands and are they reviewing?

11/24/24 2:38:16 PM EST

+17176291559

Yes. As of an hour ago

11/24/24 3:05:30 PM EST

Ok

11/24/24 3:52:23 PM EST

Anything?

11/24/24 4:48:28 PM EST

+17176291559

I talked to John. He forwarded.

11/24/24 4:49:01 PM EST

Any feeling one way or the other?

11/24/24 4:49:52 PM EST

Are they planning to make a decision tonight?

11/24/24 4:55:20 PM EST

+17176291559

I don't know. Its sunday. He was with family when I spoke to him.

11/24/24 4:55:31 PM EST

Ok.

11/24/24 5:15:26 PM EST

Any thoughts on strategy if they don't reinstate?

11/24/24 5:16:23 PM EST

I assume the investor payment program is over as is turning over any machines to them.

11/24/24 5:16:53 PM EST

+17176291559

I expect everything to be resolved with investors

11/24/24 5:17:11 PM EST

+17176291559

I'm at the extended Heller Thanksgiving dinner right now not at all trying to ignore you

11/24/24 5:17:21 PM EST

Ok. No worries.

11/24/24 5:17:38 PM EST

Would like to hear your thoughts later please.

11/24/24 9:24:40 PM EST

+17176291559

I talked to John an hour ago. They're meeting tomorrow morning. He used the word "hopeful"

11/24/24 9:24:52 PM EST

Ok. Thanks for the update.

11/24/24 9:25:21 PM EST

Did he say what time?

11/24/24 9:25:28 PM EST

They were meeting?

11/24/24 9:30:08 PM EST

+17176291559

First thing. He asked for one more piece of information.

11/24/24 9:30:29 PM EST

Liked "First thing. He asked for one more piece of inform..."

11/24/24 9:42:07 PM EST

People are asking me when funding is going to be complete for investors so this craziness ends. Anything I can communicate?

11/24/24 11:56:35 PM EST

+17176291559

Superior releases need to come in tomorrow. Nothing can happen until we receive those.

11/24/24 11:57:34 PM EST

Ok

11/25/24 8:41:26 AM EST

just spoke to clatworthy please call me

11/25/24 8:42:37 AM EST

+17176291559

We are on with legal. Critical. Text me

11/25/24 8:43:39 AM EST

Clatworthy needs authorization to have their legal counsel speak to any of the legal counsel that you provided to them. Need authorization and to know which firm represents which party

11/25/24 8:43:54 AM EST

please provide in writing asap

11/25/24 8:50:00 AM EST

are you responding to them?



Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

11/25/24 8:56:04 AM EST

+17176291559

Yes waiting for John to respond

11/25/24 8:56:13 AM EST

John Clatworthy?

11/25/24 8:57:24 AM EST

received notice from Frank DeLuca that the receivership hearing was cancelled. In your inbox if you need it.

11/25/24 8:57:51 AM EST

+17176291559

➔ Replying to you, 2024-11-25 08:56:13: « John Clatworthy? »

Yes

11/25/24 9:11:21 AM EST

+17176291559

Spoke to John and suzie. They are talking to legal. They are being a bit cryptic.

11/25/24 9:12:30 AM EST

ok

11/25/24 9:47:45 AM EST

FYI

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

11/25/24 9:47:53 AM EST

/Hb	175,000	
JBT	45,000	
Outstanding Check Allowance	(50,000)	
<b>Total Cash On Hand</b>	<b>170,000</b>	11/25
<b>Cash Expected this week</b>		
Tuesday	45,000	
Wednesday	50,000	
Thursday	-	
Friday	75,000	
<b>Total Cash Expected This Week</b>	<b>170,000</b>	
<b>Required Payments This Week</b>		<b>Due Date</b>
Payroll	315,000	11/27 Estimate
Randall's CC	20,000	Daily Tue-Fri
Cash Connect Daily	175,000	Daily Tue-Fri
Last Week's Wineskins	46,000	11/25
Health Insurance	80,867	11/27
Dental/Vision Insurance	5,473	11/27
Centaur	14,582	11/25
Centaur	15,000	11/27 Estimate
Mid Florida - 90	27,140	11/27
Alcis	5,639	11/27
ATM Network	1,843	11/27
Island Wide Logistics	12,000	11/27
McNeese	12,223	11/27
Simple Media	23,756	11/27
ATM UK	49,500	11/27
This Week's Wineskins	75,000	11/27
<b>Total Required Payments</b>	<b>851,219</b>	
<b>Net Cash Flow (Outflow)</b>	<b>(511,219)</b>	
<b>Urgent Payments</b>		
August Merchants	482,264	
September Merchants	703,863	
October Merchants	769,237	
Kore Wineskins	71,000	
Wittenbach	9,600	
All Energy	115,000	
	<b>2,151,064</b>	

11/25/24 9:47:59 AM EST

cash position this week .

11/25/24 9:53:51 AM EST

employees are asking if they will get paid this week. I assume the answer is yes?

11/25/24 9:54:56 AM EST

accounting people are asking

11/25/24 9:58:40 AM EST

we don't have enough cash to make payroll even if we don't send anything out

11/25/24 10:22:35 AM EST

may I tell employees that they are getting paid this week ? More inquiries

11/25/24 10:27:47 AM EST

+17176291559

Yes, move all the money from FNB to JT now as I don't trust FNB. I need accounts released on my side.

11/25/24 10:27:54 AM EST

+17176291559

Please wire everything in FMB to JBT now

11/25/24 10:28:15 AM EST

+17176291559

I thought payroll was in the high 2s typically? Why is it 315?

11/25/24 10:29:29 AM EST

this is inclusive of reimbursing for their monthly expenses. This is just an estimate

11/25/24 10:46:33 AM EST

anything from Clatworthy?

11/25/24 11:04:42 AM EST

Customers inquiring about why their ATMs are decashed

11/25/24 11:23:04 AM EST

+17176291559

Talked with him twice. He's now talking to legal and he's causing issues with them. Hopefully have it resolved shortly. On it nonstop

11/25/24 11:23:27 AM EST

ok

11/25/24 11:51:08 AM EST

+17176291559

Is there an option to use our other bank to start to bring some of the New York City machines back if they de cashed?

11/25/24 11:51:21 AM EST

+17176291559

Did the money go from FNB to JBT successfully?

11/25/24 11:52:07 AM EST

➔ 2024-11-25 11:51:21: « Did the money go from FNB to JBT successfully? »

Yes

11/25/24 11:52:48 AM EST

➔ 2024-11-25 11:51:21: « Did the money go from FNB to JBT successfully? »

Possibly but it would take a couple of weeks. We'd lose all of the business by then. Much faster with cash connect

11/25/24 12:39:05 PM EST

In spite of the fact that Jon says that they can put cash right back in it takes a lot longer to put it in then to take it out. The longer this goes the worse it is for us

11/25/24 12:39:28 PM EST

+17176291559

Messaged him twice. Both of our legal spoke to his legal over an hour ago.

11/25/24 12:39:42 PM EST

+17176291559

Do we not have other cash loaders in New York City that we pay a percentage of transaction?

11/25/24 12:39:47 PM EST

+17176291559

Meaning non-armored

11/25/24 12:40:46 PM EST

Yes, we're looking into that but it will take some time for them to get cash together. These are small guys that don't have a lot of extra cash laying around and they'll have to go in and drill the locks.

11/25/24 12:43:22 PM EST

We don't have enough locks to do this either and it would take time to get especially with the holidays

11/25/24 12:44:54 PM EST

Do you think it's likely that they will reverse their decision?

11/25/24 12:45:48 PM EST

Because ultimately that is the fastest solution.

11/25/24 12:47:01 PM EST

I think some of our larger competitors that have access to cash and Lox will swoop in pretty quickly especially because they're just waiting for us. Plus reputationally we are in a very bad position.

11/25/24 12:47:40 PM EST

I'm worried that other cash provider will hear what Cash Connect is doing and follow suit

11/25/24 12:47:49 PM EST

Then the only thing we have left is our loader business, which is not much

11/25/24 12:48:36 PM EST

First Premier is a bank and they load the cannabis locations.

11/25/24 12:48:40 PM EST

+17176291559

➔ Replying to you, 2024-11-25 12:44:54: « Do you think it's likely that they will reverse their decision? »

He seemed hopeful last night and this morning. He's not responding to my multiple text. He said they had to have another meeting.

11/25/24 12:49:10 PM EST

+17176291559

Did we get money pushed over to JBT? How much is in JBT and first regents?

11/25/24 12:49:20 PM EST

Yes we did

11/25/24 12:50:17 PM EST (Edited 11/25/24 12:50:31 PM EST)

I assume the investor deal will fall apart very quickly if we lose both of our cash providers?

Edited

11/25/24 12:51:55 PM EST

We have about 325 locks in stock.

11/25/24 12:52:24 PM EST

+17176291559

➔ Replying to you, 2024-11-25 12:50:17: « I assume the investor deal will fall apart very quickly if we lose both of our cash providers? »

No! I'm doing everything possible to make sure that doesn't happen

11/25/24 12:52:56 PM EST

OK

11/25/24 1:06:08 PM EST

Rabah wants to move his terminals to another ISO who is with cash connect Ok?

11/25/24 1:06:51 PM EST

He wants to get them to a safe place.

11/25/24 1:07:19 PM EST (Edited 11/25/24 1:07:51 PM EST)

If you would like to discuss with him he is ready

Edited

11/25/24 1:08:08 PM EST

He is saying what we are all believing is that this goes beyond today and it's over

11/25/24 1:09:06 PM EST

He thinks he can get them away from Paramount, he is not saying that Paramount doesn't own them, but at least protect them from the damage caused by Paramount

11/25/24 1:11:58 PM EST

He needs our permission to do so

11/25/24 1:15:29 PM EST

+17176291559

Why would we give him that permission? Would he pay us? We can't turn over the title of the ATMs to him

11/25/24 1:15:45 PM EST

We are not turning over. He just wants to move them off of our processing and off of our Cash relationships

11/25/24 1:15:53 PM EST

And have them sponsored by another ISO

11/25/24 1:18:48 PM EST

+17176291559

What are risks?

11/25/24 1:19:58 PM EST

The new ISO might have significantly more cost, so we may make no money off this book of business for a while or a lot less. We'd have no visibility into this either because it would not be on any of our monitoring or reporting.

11/25/24 1:20:29 PM EST

+17176291559

Find out what their cost structures are. Tell Mike to give you a proposal to protect 100% of our margin.

11/25/24 1:20:41 PM EST

+17176291559

The payments will need to come directly to us, not him

11/25/24 1:37:37 PM EST

The payments are gonna have to settle to an account wherever the expenses are gonna go. We will have access to that bank account and also to reporting so we know what's going on. I gave him approval

11/25/24 1:49:41 PM EST

Anything from Clatworthy?

11/25/24 1:53:32 PM EST

+17176291559

We need to control that bank account

11/25/24 1:53:39 PM EST

?

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11/25/24 1:53:41 PM EST

+17176291559

➔ Replying to you, 2024-11-25 13:49:41: « Anything from Clatworthy? »

No, will call him again

11/25/24 1:53:52 PM EST

Ok

11/25/24 2:22:58 PM EST

I know that you have a much different perspective than I do with the investors and I'm trying to piece together bits and pieces of text messages, but I don't understand how you can pay investors what you have agreed to pay them if Paramount is just a fraction of the size it was before?

11/25/24 2:25:30 PM EST

it just seems to me that losing half our margin is a major problem.

11/25/24 2:28:38 PM EST

I guess I don't understand your confidence that we are going to be ok here.

11/25/24 2:32:53 PM EST

can you help me understand?

11/25/24 2:38:04 PM EST

Row Labels	Count of TID	Sum of T12 Avg GP	Sum of T3 Avg GP
ATM Profit	4	\$ (136)	\$ (71)
ATMWW	92	\$ 10,152	\$ 13,151
ATMWW AID	20	\$ 2,424	\$ 3,791
BB Financial	152	\$ 26,409	\$ 28,920
BeanBuddies	12	\$ 3,939	\$ 3,401
Big Apple	12	\$ 8,289	\$ 5,727
CAI	52	\$ 8,267	\$ 10,398
City Cash	3	\$ 404	\$ 818
CKE	45	\$ 6,980	\$ 6,314
CMV	6	\$ 414	\$ 1,075
Eagle ATM	5	\$ 1,822	\$ 2,082
FAB	19	\$ 6,372	\$ 7,247
First National ATM	8	\$ 802	\$ 1,349
First Rogers	1	\$ 180	\$ 270
Geng Fabiani	116	\$ 27,729	\$ 36,728
Groceries	17	\$ (965)	\$ (1,199)
Hillside	23	\$ 6,881	\$ 6,431
Just ATM USA	427	\$ (2,481)	\$ (9,535)
Know Tone	88	\$ 22,068	\$ 23,086
MA PHLBS	14	\$ 2,848	\$ 3,872
Motts	37	\$ 2,110	\$ 5,616
Mattch	144	\$ 28,919	\$ 26,266
Mac Market	120	\$ 22,928	\$ 28,334
Moika	44	\$ 19,881	\$ 18,143
Multiplex	3	\$ 1,139	\$ 1,217
Not Found	1,802	\$ -	\$ -
NVCareport	5	\$ (813)	\$ (838)
PA TPIK	23	\$ 2,870	\$ 4,448
Princess	136	\$ (40,321)	\$ (82,179)
PrismQuest	10	\$ 1,971	\$ 1,399
Radsons	38	\$ 2,341	\$ 2,879
SAB	16	\$ 2,955	\$ 2,660
Sharmel	85	\$ 19,507	\$ 20,714
Single	7	\$ 1,594	\$ 3,183
Southeast ATM Alliance, LLC	5	\$ (408)	\$ 179
Starlight	67	\$ 20,942	\$ 16,919
Symphony	1	\$ (4)	\$ (57)
TNT	166	\$ 78,868	\$ 74,754
WAFAZ	1	\$ 67	\$ 165
WC	9	\$ 1,513	\$ 1,627
Grand Total	3,835	\$ 267,859	\$ 301,287



11/25/24 2:38:20 PM EST

here is the potential monthly impact of losing cash Connect

11/25/24 2:43:35 PM EST

we think this report is not accurate — much higher margin than this.

11/25/24 2:43:44 PM EST

1,802 terminals with No GP data

11/25/24 2:43:51 PM EST

could be double this.

11/25/24 2:46:44 PM EST

plus we are down \$200k for Cypress, \$135k for Phonco, \$80k for ATM Group.

11/25/24 2:48:10 PM EST

any way you can give me any comfort here?

11/25/24 2:59:04 PM EST

I need to talk to you please.

11/25/24 3:01:49 PM EST

+17176291559

I'm on with legal

11/25/24 3:02:06 PM EST

any response from Clatworthy?

11/25/24 3:03:03 PM EST

assuming they didn't change their mind, I need to talk to you about what to do with paramount. I will need to lay off alot of people. asap

11/25/24 3:05:42 PM EST

you have been avoiding talking to me for weeks. please promise you will call me when you are off that call.

11/25/24 3:10:37 PM EST

October 2 was the last time we talked — 7 weeks.

Messages - +17176291559 +17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

11/25/24 3:16:14 PM EST

after what I've been through, I deserve a call where i can talk to you. or better yet to meet you in person.

11/25/24 3:31:00 PM EST

plus we are losing Sharenet revenue. See Ray's email.

11/25/24 3:38:03 PM EST

he is also, telling us to stop using they software we use to run the company.

11/25/24 3:38:14 PM EST

sending Azure a cease and desist.

11/25/24 3:49:42 PM EST

ATMWW	93	\$	10,139	\$	13,151
ATMWW/ATD	20	\$	2,424	\$	3,701
BBB Financial	184	\$	25,520	\$	29,033
BoardBuddies	12	\$	3,039	\$	3,401
Big Apple	25	\$	6,562	\$	10,137
BluVyne Management LLC	16	\$	(1,733)	\$	(2,091)
CAI	52	\$	8,287	\$	10,308
Cash Reside	125	\$	590	\$	587
City Cash	3	\$	464	\$	818
CKE	45	\$	6,980	\$	8,314
CNY	6	\$	414	\$	1,075
Eagle ATM	5	\$	1,822	\$	2,092
FAB	19	\$	6,372	\$	7,247
First National ATM	7	\$	939	\$	1,384
First Regents	259	\$	62,534	\$	65,670
Greg Fabiani	113	\$	27,543	\$	25,920
Groceries	17	\$	(985)	\$	(1,198)
Hillside	24	\$	7,323	\$	7,358
JustATMs USA	425	\$	(2,346)	\$	(9,319)
Know Tone	88	\$	22,068	\$	23,086
MA PMS/PS	14	\$	2,646	\$	3,972
Malls	37	\$	2,110	\$	3,616
MarTech	145	\$	26,489	\$	26,735
Met Market	128	\$	22,241	\$	27,722
Hotels	43	\$	15,311	\$	17,344
Multiplex	3	\$	1,130	\$	1,217
NYCAirport	5	\$	(813)	\$	(836)
PA TPK	23	\$	2,870	\$	4,448
Phonco	136	\$	(48,521)	\$	(42,170)
PowerQuest	10	\$	1,071	\$	1,393
Rodgers	38	\$	2,341	\$	2,879
SAB	16	\$	2,055	\$	2,660
Sharenet	85	\$	19,429	\$	20,643
Sharenet ETS	90	\$	10,355	\$	9,909
Single	7	\$	1,594	\$	3,153
Southeast ATH Alliance, LLC	5	\$	(408)	\$	179
Stargit	67	\$	20,942	\$	18,919
Synergy	1	\$	(4)	\$	(57)
TNT	187	\$	69,889	\$	73,741
Uptown ATM	35	\$	867	\$	624
VCHD	900	\$	84,229	\$	82,523
WAFaz	1	\$	67	\$	165
WC	9	\$	1,513	\$	1,627
Grand Total	3107	\$	395,875	\$	431,015

11/25/24 3:49:47 PM EST

this looks accurate

11/25/24 3:51:40 PM EST

Can I meet you for drinks now

11/25/24 3:58:10 PM EST

+17176291559

➔ Replying to you, 2024-11-25 15:02:06: « any response from Clatworthy? »

No, but he gave me some confidence the last two conversations. He said a few more meetings coming up. We need to get a response from him before any decisions.

Randall, I will take care of you and pay you the buyout we discussed plus some Additional. If Clatworthy doesn't turn us back on then, I think we need to seriously consider just turning the network over and moving you and key players into power ping

I think I can pull this investor DOI perhaps even if Clatworthy doesn't turn us back on. I'm on it all day long. I'm sorry I haven't broke from it.

11/25/24 4:00:22 PM EST

thank you and I'm happy to do that.

11/25/24 4:00:27 PM EST

+17176291559

➔ Replying to you, 2024-11-25 15:38:03: « he is also, telling us to stop using they software we use to run the company. »

We own it. He can't do that

11/25/24 4:00:33 PM EST

+17176291559

➔ Replying to you, 2024-11-25 15:38:03: « he is also, telling us to stop using they software we use to run the company. »

Ask Steve

11/25/24 4:00:37 PM EST

+17176291559

➔ Replying to you, 2024-11-25 15:38:03: « he is also, telling us to stop using they software we use to run the company. »

About it

11/25/24 4:00:47 PM EST

he is saying his right to our property extends to this.

11/25/24 4:01:03 PM EST

+17176291559

We need to get Steve to stop that given. It runs the company.

11/25/24 4:01:35 PM EST

agreed

11/25/24 4:03:07 PM EST

How can you turn over terminals to the investors and avoid massive lawsuits given that we are down to the terminals we have. I'm happy to leave PMG

11/25/24 4:04:21 PM EST

i just don't understand and this is absolutely maddening to me. I can't get my head around and it makes me think that you aren't seeing reality

11/25/24 4:11:38 PM EST

+17176291559

I'm selling all Heller investment holdings which is worth 200+ million

11/25/24 4:11:44 PM EST

+17176291559

And three portfolio companies

11/25/24 4:11:56 PM EST

ahhh....

11/25/24 4:12:01 PM EST

that's the piece I'm missing.

11/25/24 4:12:40 PM EST

so you turn over Paramount plus pay them the difference?

11/25/24 4:12:50 PM EST

+17176291559

I said that earlier but may have been missed

11/25/24 4:13:38 PM EST

so it's not either they get the Paramount OR they get paid. It's both?

11/25/24 4:14:23 PM EST

+17176291559

Some of both

11/25/24 4:14:34 PM EST

ok. that's the key piece I was missing

11/25/24 4:14:36 PM EST

+17176291559

Sorry, I'm talking and leading this car

11/25/24 5:10:53 PM EST

Last question then I will leave you alone. When is closing occurring?

11/25/24 5:15:37 PM EST

And I'm happy to resign from PMG whenever you want me to if you turn it over to them.

11/25/24 5:15:59 PM EST

+17176291559

Trying to do Wednesday or Friday.

11/25/24 5:16:24 PM EST

Cool.

11/25/24 5:16:49 PM EST

Will I get some money then too?

11/25/24 7:17:30 PM EST

Anything from Clatworthy?

11/25/24 7:21:03 PM EST

+17176291559

I messaged him 10 minutes ago and he responded with two questions. Did not respond to my answers.

11/25/24 7:22:08 PM EST

Ok

11/25/24 7:25:40 PM EST

Everyone is freaking out at work right now. Can you join company meeting tomorrow? I have no idea what to say to everyone

11/25/24 7:25:53 PM EST

3 pm

11/25/24 10:22:55 PM EST

+17176291559

I just had a call with Billy and legal. Ray Davis sent in that letter. Did we get a leader sent out to stop a. Ease and desist. They can't take our software from us. Impossible

11/25/24 10:24:16 PM EST

I forwarded to Devin and asked him to push back. He said needed to look into this.

11/25/24 10:25:58 PM EST

+17176291559

Push him for response and answers

11/25/24 10:26:05 PM EST

Ok

11/25/24 10:30:33 PM EST

Cypress is also pushing you for a response and you could be sanctioned personally.

11/25/24 10:30:37 PM EST

Daryl-Devin just emailed you re: Cypress's counsel seeking sanctions against you personally. We need you to sign and return the discovery responses that Devin sent. Rose is on the email too (4:43pm Monday)

11/25/24 10:33:54 PM EST

Can we send payment to Ray Davis so this goes away? I assume we will need to do payment regardless?

11/25/24 11:06:52 PM EST

Gierasch has been pushing for payment.

11/25/24 11:07:21 PM EST

I think this could impact their ability to work for us on the Davis thing

11/26/24 7:26:36 AM EST (Edited 11/26/24 7:26:44 AM EST)

Are the FNB accounts released from the garnishment? I need to get beach house mortgage payment out.

Edited

11/26/24 7:26:50 AM EST

This is really late

11/26/24 7:30:28 AM EST

Plus we are desperate for cash. Need some to make payroll.

11/26/24 7:49:59 AM EST

+17176291559

➔ Replying to you, 2024-11-26 07:26:36: « Are the FNB accounts released from the garnishment? I need to get beach house mortgage payment out. »

As of late yesterday but FNB took money from me. How much for beach house?

11/26/24 7:50:18 AM EST

we have the cash in the account so we are ok there.

11/26/24 7:53:20 AM EST

+17176291559

John is giving me vague answers. I texted him again this morning.

Could we put TNT and other New York City on the Mike Rabah strategy you're implementing with him? Or could I do something similar with Dave Charles? I need to understand options.

11/26/24 7:54:27 AM EST



11/26/24 7:54:31 AM EST

from Steve Gernes

11/26/24 7:59:16 AM EST

I don't know who Mike Rabah is using. I think Dave Charles is a good option and the only real option we can think of. If we can get him and Clatworthy to accept they can stop defunding machines and reload them. \

11/26/24 8:00:08 AM EST

our only other options are to find loaders or get First Premier set up but each of these will take days/weeks to resolve

11/26/24 8:07:13 AM EST

texting with Gernes, we both believe that Dave Charles solution is our only hope of saving this business.

11/26/24 8:11:18 AM EST

+17176291559

How would we frame it to him? What would we ask/request? I need it outlined on an email if I'm going to make an ask.

11/26/24 8:14:51 AM EST

We are asking Dave Charles if we can participate in his cash resale program — he provides cash, forecasting, armored services to us and adds margin to make money doing this.



Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.net, +17179175670, randall.leanman@paramountmgp.com, +17179172753

11/26/24 8:14:58 AM EST

like we did for others.

11/26/24 8:15:22 AM EST

we subcontract our armored cash needs to him.

11/26/24 8:15:48 AM EST

this was a small profit center at Paramount. It may be a large one for him.

11/26/24 8:19:50 AM EST

+17176291559

Liked "We are asking Dave Charles if we can participate i..."

11/26/24 8:20:02 AM EST

+17176291559

So you're engaging him now?

11/26/24 8:20:24 AM EST

+17176291559

I would frame it as the fear cash connect has of investors as to why we're doing this

11/26/24 8:22:00 AM EST

I can, but to get past the reason that the investor program caused them problems is probably gonna take your explanation because if Cash Connect is worried about it. He will be as well. I think you need to call him. Have the explanation. Tell him what we're looking for and get him to agree to it. If he agrees then we can move forward with it from that point otherwise it's gonna be me guessing and him asking questions and I think it's gonna look bad.

11/26/24 8:23:38 AM EST

I'm running into the same issue with a bunch of other people right now. People are asking questions about the investor program and funding and I am telling them I don't have any answers.

11/26/24 8:25:10 AM EST

I suspect Dave Charles may also try to negotiate to buy the company at that point as well

11/26/24 8:25:23 AM EST

Or at least ask for a shot at it

11/26/24 8:26:34 AM EST

how much cash can you get us today. We need minimally \$100k for payroll. but we have numerous vendors who are going to put us on credit hold.

11/26/24 8:27:21 AM EST

+17176291559

Cash connect was concerned that investors were gonna take their cash, which is impossible.

11/26/24 8:27:46 AM EST

+17176291559

I'm working with Steve at FNB to return the money he took

11/26/24 8:28:07 AM EST

+17176291559

So we have no money in orrstown account with FNB

11/26/24 8:28:24 AM EST

➔ 2024-11-26 08:27:21: « Cash connect was concerned that investors were gonna take their cash, which is impossible. »

it isn't impossible. our friend Jordan Mirch proved that

11/26/24 8:28:55 AM EST

he changed all of the cash settlement accounts to his personal bank account and stole US Banks money

11/26/24 8:31:22 AM EST

+17176291559

Hmmm

11/26/24 8:32:05 AM EST

that's what cash connect is worried about. they have no control over the processor bank accounts. We could do the same for all they know. With a judgment that size, they think we might be tempted to do that

11/26/24 8:32:58 AM EST

have a variety of other potential owners whom they do not know and have not vetted is very concerning to them

11/26/24 8:36:09 AM EST

+17176291559

Understood.

11/26/24 8:36:15 AM EST

+17176291559

Is there any reason they would reject Dave Charles?

11/26/24 8:36:37 AM EST

I don't think so.

11/26/24 8:38:52 AM EST

because dave charles is in control of everything.

11/26/24 8:39:31 AM EST

+17176291559

Liked "because dave charles is in control of everything. "

11/26/24 8:46:35 AM EST

The sooner Dave can agree to this the sooner we can communicate with Jon at Cash Connect and let him know that Dave Charles is taking over. They may stop decashing the machines if Dave can give them assurances that he's taking over.

11/26/24 9:05:10 AM EST

+17176291559

Please take to have

11/26/24 9:05:12 AM EST

+17176291559

Dave

11/26/24 9:05:47 AM EST

ok but I think this will go bad if you aren't talking to him about this.

11/26/24 9:06:57 AM EST

+17176291559

Do you want to frame it up in an email or text so that ask is clear. If you do that, I could forward it as well.

11/26/24 9:07:38 AM EST

yes. i can do this. I believe he will want ask questions that only you can answer.

11/26/24 9:12:26 AM EST

just emailed to you

11/26/24 9:40:45 AM EST

For Dave Charles

11/26/24 9:40:48 AM EST

In light of Cash Connect decision to decash our ATMs, will you please reach out to Dave Charles to see if we can transfer our bailment/armored relationship to Cash Depot? Cash Depot will be responsible for forecasting, bailment, armored car, insurance, etc. and will charge us a fee for this service. Assuming they are willing to do this, we need them to reach out to John Clatworthy to stop the decashing of our machines and to reload the ones that have been decashed.

11/26/24 10:32:15 AM EST

Anything out of Dave Charles?

11/26/24 12:31:31 PM EST

Daryl, please see emails from Torosian's office

11/26/24 12:32:05 PM EST

traditions bank filed

11/26/24 12:50:04 PM EST

what am I telling Dave Charles?

11/26/24 12:50:09 PM EST

he is calling me

11/26/24 12:52:50 PM EST

+17176291559

I'm with legal. Ask him if we can do deal the runs his contracts but margin starts with us. He gets a small share if margin

11/26/24 12:54:29 PM EST

sorry — not following what you are saying

11/26/24 12:54:46 PM EST

+17176291559

Runs the rails of his contract with cash connect, but we still get the margin

11/26/24 12:55:17 PM EST

ahh..

11/26/24 12:55:19 PM EST

got it.

11/26/24 12:55:56 PM EST

but its ok to transfer ownership of agreements to him?

11/26/24 1:00:16 PM EST

hello?

11/26/24 1:05:24 PM EST

+17176291559

I'm  
Concerned about doing that unless it can be unwound immediately upon notice.

Does this really fix our problem with cash connect

11/26/24 1:12:05 PM EST

Dave is saying that CashConnect will not put their cash in terminals owned by Paramount and/or our investors. That the only way they will permit cash to placed in these terminals is if the merchant agreement is owned by Cash Depot.

11/26/24 1:12:21 PM EST

so we need to transfer to them.

11/26/24 1:13:50 PM EST

I don't think we can unwind this immediately.

11/26/24 1:22:47 PM EST

what say you?

11/26/24 1:57:19 PM EST

From Brandon

11/26/24 1:57:20 PM EST

Hi Randall, I am disappointed to see that this is being moved. I have heard from numerous people today, not just in my own department but others as well.

I feel I am obligated to share; the lack of information and continual movement of this meeting is not sitting well with them. Many don't understand, me included, how there can't be an update and why this hasn't been resolved.

Many of them have the same question, seeing the court document says Daryl has until Thursday to produce essentially the business to the fund managers, what does that mean for the employees? I think it was the same fear last week when some people thought we had different owners.

Separately and personally, I feel as if a handful of the staff are looking for jobs elsewhere.

Brandon Hall

11/26/24 1:57:37 PM EST

I want to respond but don't know how

11/26/24 2:01:18 PM EST

see email from Torosian

11/26/24 2:15:28 PM EST

➔ Replying to you, 2024-11-26 13:12:05: « Dave is saying that CashConnect will not put their cash in terminals owned by Paramount and/or our inv... »

need your approval. If not, we will likely lose this business.

11/26/24 2:47:44 PM EST

Just so you are aware, Cash Connect is demanding \$2M payment tomorrow. I worry that they will file a lawsuit that will further delay the investor funding.

11/26/24 4:14:46 PM EST

by the way — First Premier — the bank who provides vault cash for all our dispensary terminals and more has requested a meeting with Steve to talk about investor issue. I asked Steve to delay until tomorrow so you could join the call.

11/26/24 4:57:26 PM EST



Letter to L. Alcott re R. Davis communication to Paramount 11-26-24.pdf

11/26/24 4:57:38 PM EST

here is what you need for Ray Davis issue

11/26/24 5:16:13 PM EST

I found out from somebody else that we do not need to transfer the location agreements. I think Dave Charles was just playing us.

11/26/24 5:16:26 PM EST

ATM of America Sabah is interested in loading these for us. We are working through this now.

11/26/24 8:19:52 PM EST

Any chance the investors get paid tomorrow and their claim to these ATMs can be released and we can go back to Cash Connect and tell them that we now own them again?

11/26/24 8:19:57 PM EST

We could at least save some ATMs

Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.  
net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

11/26/24 8:46:12 PM EST

+17176291559

Possibly.

11/26/24 8:46:18 PM EST

+17176291559

➔ Replying to you, 2024-11-26 17:16:26: « ATM of America Sabah is interested in loading these for us. We are working through this now. »

Will this happen?

11/26/24 8:46:36 PM EST

+17176291559

➔ Replying to you, 2024-11-26 13:57:20: « Hi Randall, I am disappointed to see that this is being moved. I have heard from numerous people today... »

They gave us to Monday. Do you want me to try to put something out tomorrow?

11/26/24 8:46:53 PM EST

We can make it happen. We have been turning over to loaders first and seeing what they take.

11/26/24 8:47:54 PM EST

➔ Replying to you, 2024-11-26 13:57:20: « Hi Randall, I am disappointed to see that this is being moved. I have heard from numerous people today... »

Would be helpful. What is the likelihood of Monday?

11/26/24 8:48:57 PM EST

And what happens to Paramount after this? We are going to be a fraction of the size we started which is going to require significant layoffs.

11/26/24 8:50:14 PM EST

+17176291559

With them now. Hit you later

11/26/24 8:50:18 PM EST

Ok



11/26/24 8:51:21 PM EST

Plus we have another lawsuit or two that will likely appear before Monday so I think we will again be delayed.

11/26/24 8:54:58 PM EST

Also we are so out of cash that we cannot even pay our Microsoft office licenses. Everything shuts down on Friday

11/26/24 9:45:54 PM EST

Posted in Reddit.

11/26/24 9:45:56 PM EST

This is from Reddit, which I usually read with a grain of salt:

Here is an update. Paramount's bank pulled the cash from their ATMs yesterday, the machines are now without money. They were supposed to have a companywide meeting today with the employees, it was canceled at the last minute. Employees don't know what is going on and getting information from this chat and customers. Also, many of their ATM partners are pulling their ATMs from Paramount and taking the operations back. One insider stated that management doesn't know what to do and is basically not being truthful to the employees about the dire situation. Many employees are realizing they have been lied to all along. It seems the end is now near. Investor representatives nowhere to be found. Seems like a dire situation, lots of confusion and lack of information.

11/26/24 9:46:54 PM EST

From Gernes

11/26/24 9:53:07 PM EST

I just can't take it any more

11/26/24 10:15:43 PM EST

I am done

11/26/24 11:23:18 PM EST

+17176291559

Randall, I'm sorry. I would be very careful not to read Reddit or any newspaper. I was warned about that from the beginning and refused to read anything. It's not healthy and it just messes with one.

This is probably Jordan Mitch writing or someone like that. It's a very calculated and clearly from someone like Mitch or Jorge.

11/26/24 11:34:21 PM EST

The problem is that this Reddit post is true.

11/26/24 11:34:32 PM EST

From my perspective.

11/26/24 11:36:15 PM EST

I believe this is how our employees are seeing things

11/27/24 6:24:45 AM EST

#### Times for First Premier Call Today

Time that First Premier is available (all CST, so add an hour)

7:30-8:30

10:30-12:00

2:00-5:00

11/27/24 6:27:41 AM EST

Good morning Daryl. First Premier is our ONLY source of cash for dispensary locations. They called Steve and requested a meeting today to discuss the investor program. He plans to talk to them but I think you should be on the call. If we lose First Premier we have NO other way to take care of this business as no one else provides cash to dispensaries. If you want to be on the call please let me know which time works for you

11/27/24 6:42:39 AM EST (Edited 11/27/24 6:42:51 AM EST)

Also, if you are able to give some comfort to our employees, an email from you would be helpful this morning so I can send to them today. I understand if you can't.

Edited

11/27/24 7:09:47 AM EST

+17176291559

Good morning. I will craft messages for employees. I'm still trying to get this funded today and on call with Barclays observational right now

11/27/24 7:10:04 AM EST

+17176291559

I just got this from fund managers. I presume this is not accurate.

We are getting this information on in the market

According to employees, Paramount has released all partners to get new terminal ids and move the business

11/27/24 7:10:06 AM EST

Liked "Good morning. I will craft messages for employees..."

11/27/24 7:10:40 AM EST

We have given them the right to create new TID's to get cash. This is exactly what we would need to do with Dave Charles or Saba.

11/27/24 7:10:56 AM EST

We have not given up ownership of the ATMs, but have allowed them to find new processing relationships so they can get Cash Connect cash or cash

11/27/24 7:11:17 AM EST

+17176291559

Pp can you help me understand that is I need to respond. We need to make sure we don't give up the right to the network.

11/27/24 7:11:29 AM EST

We didnt.

11/27/24 7:11:34 AM EST

+17176291559

So this would not be processing on our processors

11/27/24 7:11:54 AM EST

Correct. In order to get Cash Connect cash, they cannot be on our processor relationships

11/27/24 7:12:13 AM EST

They have to come under another ISO

11/27/24 7:12:38 AM EST

And this could be for other cash as well

11/27/24 7:12:44 AM EST

Primarily a Cash Connect issue

11/27/24 7:13:18 AM EST

The only thing we freed them up to do is find alternate sources of cash and maintenance

11/27/24 7:13:38 AM EST

+17176291559

Why maintenance, does that tie to cash?

11/27/24 7:13:48 AM EST

Yes

11/27/24 7:13:49 AM EST

+17176291559

Did we do that for everyone or just some of them?

11/27/24 7:14:00 AM EST

+17176291559

Did we put out a mass email?

11/27/24 7:14:01 AM EST

Some of them, but they are the major ones

11/27/24 7:14:16 AM EST

No. We did this one at a time as they said they found a way to keep the ATMs loaded.

11/27/24 7:14:22 AM EST

So each relationship is different

11/27/24 7:14:45 AM EST

It's not too late to pull back on any of this at the moment but we need to know now

11/27/24 7:14:53 AM EST

+17176291559

So if it's not under our terminal ID, how would we get paid? How would we bring them back?

11/27/24 7:15:28 AM EST

I've asked for login access for all other terminals

11/27/24 7:15:36 AM EST

And have told them that we may bring this back at some point in the future

11/27/24 7:15:43 AM EST

+17176291559

This would only be if it is staying with Cash connect. Self loader that is not the case?

11/27/24 7:15:52 AM EST

Correct

11/27/24 7:16:08 AM EST

+17176291559

We need to tell them we are 100% will bring it back. What is the agreement on payment?

11/27/24 7:16:09 AM EST

But honestly, just trying to save the locations. I don't know if they are using Cash Connect only or any other source of funds might be there too.

11/27/24 7:16:31 AM EST

+17176291559

But the only reason we would let them change from our terminal IDs would be for cash connect, correct?

11/27/24 7:16:38 AM EST

+17176291559

Can we make that clear to them?

11/27/24 7:16:41 AM EST

I can put a stop to this right now but I need to tell them how we're gonna get cash to the

11/27/24 7:16:46 AM EST

Machines.

11/27/24 7:16:55 AM EST

➔ 2024-11-27 07:16:31: « But the only reason we would let them change from our terminal IDs would be for cash connect, correct? »

Correct.

11/27/24 7:17:27 AM EST

But what's happening is everybody's feeling and believing that Paramount is going to shut its doors in the next couple of days so I think they're thinking beyond Cash Connect

11/27/24 7:17:59 AM EST

+17176291559

Can you craft an email that makes it clear this is an interim move for cash connect locations only and that we need access to the terminals and margin and then in the near future will be bringing them back?

11/27/24 7:18:12 AM EST

In Mozika's case, they are going to load the machines themselves and have the cash settled to them so they can pay customers and themselves

11/27/24 7:18:28 AM EST

Cause right now we are behind three months on customer payments.

11/27/24 7:18:51 AM EST

➔ 2024-11-27 07:17:59: « Can you craft an email that makes it clear this is an interim move for cash connect locations only and that we need acc... »

Yes I can do this.

11/27/24 7:19:16 AM EST

I will copy you on the email

11/27/24 7:19:19 AM EST

+17176291559

I'm concerned that the fund managers will snqp. Craft email and let me review it with you before we send it.

11/27/24 7:19:29 AM EST

OK

11/27/24 7:27:15 AM EST

Dear partner

We appreciate all of your willingness to do what is necessary to find an alternative cash supplier in light of our current situation with Cash Connect. To be clear, we are only temporarily allowing you to move terminals to other processors and create new TIDs so that we can secure Cash Connect cash for these locations. In doing so, we need to be given login access to the terminals so we can properly account for this activity. If you have any questions about this, please reach out to me.

11/27/24 7:27:20 AM EST

+17176291559

We just need to make it clear that this is an in remove on cash and that ownership, location agreement, revenue etc. remain the asset of Paramount

11/27/24 7:29:27 AM EST

We appreciate all of your willingness to do what is necessary to find an alternative cash supplier in light of our current situation with Cash Connect. To be clear, we are only temporarily allowing you to move terminals to other processors and create new TIDs so that we can secure Cash Connect cash for these locations. In doing so, we need to be given login access to the terminals so we can properly account for this activity. ATMs, merchant agreements, revenue and any other asset remain property of Paramount Management Group. If you have any questions about this, please reach out to me.

11/27/24 7:30:35 AM EST

ok?

11/27/24 7:30:44 AM EST

No one has made any change yet

11/27/24 7:30:55 AM EST

I can pull this back if needed

11/27/24 7:33:03 AM EST

+17176291559

Hang tight.

11/27/24 7:33:10 AM EST

ok

11/27/24 7:37:33 AM EST

+17176291559

We appreciate your partnership to do what is necessary to continue to provide cash in light of our current situation with Cash Connect. To be clear, we are only temporarily allowing you to move terminals to other processors and create new TIDs so that we can secure Cash Connect cash for these locations. In doing so, we need to be given login access to the terminals so we can properly account for this activity. ATMs, merchant agreements, revenue and any other asset remain property of Paramount Management Group. If you have any questions about this, please reach out to me.

11/27/24 7:37:56 AM EST

+17176291559

Does that work? I am isolating cash only.

11/27/24 7:38:09 AM EST

+17176291559

Can we say that the only time they can change terminal ideas for cash connect cash and if it's self-loading or otherwise they cannot



11/27/24 7:38:15 AM EST

+17176291559

They simply would only need to do it for cash connect, correct

11/27/24 7:38:20 AM EST

+17176291559

Could you further clarify that?

11/27/24 7:38:23 AM EST

yes. I can say that

11/27/24 7:38:38 AM EST

+17176291559

Thx

11/27/24 7:38:46 AM EST

+17176291559

Amend what I amended and then sent back to me again

11/27/24 7:39:33 AM EST

We appreciate all of your willingness to do what is necessary to find an alternative cash supplier in light of our current situation with Cash Connect. To be clear, we are only temporarily allowing you to move terminals to other processors and create new TIDs so that we can secure Cash Connect cash only for these locations. For any other cash loading relationship, the TIDs need to remain with Paramount's existing processors. In doing so, we need to be given login access to the terminals so we can properly account for this activity. ATMs, merchant agreements, revenue and any other asset remain property of Paramount Management Group. If you have any questions about this, please reach out to me.

11/27/24 7:39:54 AM EST

+17176291559

➔ Replying to you, 2024-11-27 07:39:33: « We appreciate all of your willingness to do what is necessary to find an alternative cash supplier in ... »

That is not my language. I changed the first sentence.

11/27/24 7:40:01 AM EST

+17176291559

➔ Replying to you, 2024-11-27 07:39:33: « We appreciate all of your willingness to do what is necessary to find an alternative cash supplier in ... »

Can you keep my first sentence?

11/27/24 7:40:47 AM EST

We appreciate your partnership to do what is necessary to continue to provide cash in light of our current situation with Cash Connect. To be clear, we are only temporarily allowing you to move terminals to other processors and create new TIDs so that we can secure Cash Connect cash only for these locations. For any other cash loading relationship, the TIDs need to remain with Paramount's existing processors. In doing so, we need to be given login access to the terminals so we can properly account for this activity. ATMs, merchant agreements, revenue and any other asset remain property of Paramount Management Group. If you have any questions about this, please reach out to me.

11/27/24 7:41:27 AM EST

Dear partner

We appreciate your partnership to do what is necessary to continue to provide cash in light of our current situation with Cash Connect. To be clear, we are only temporarily allowing you to move terminals to other processors and create new TIDs so that we can secure Cash Connect cash only for these locations. For any other cash loading relationship, the TIDs need to remain with Paramount's existing processors. If you move the TIDs to a new processor for cash connect cash, we need to be given login access to the terminals so we can properly account for this activity. ATMs, merchant agreements, revenue and any other asset remain property of Paramount Management Group. If you have any questions about this, please reach out to me.

11/27/24 7:41:31 AM EST

further modified

11/27/24 7:42:07 AM EST

+17176291559

We appreciate your partnership to do what is necessary to continue to provide cash in light of our current situation with Cash Connect. To be clear, we are only temporarily allowing you to move terminals to other processors and create new TIDs so that we can secure Cash Connect cash only for these locations. For any other cash loading relationship outside of Cash Connect, the TIDs need to remain with Paramount's existing processors. In doing so, we need to be given login access to the terminals so we can properly account for this activity. ATMs, merchant agreements, revenue and any other asset remain property of Paramount Management Group. If you have any questions about this, please reach out to me.

11/27/24 7:42:40 AM EST

ok. shall I send it?

11/27/24 7:45:40 AM EST

+17176291559

Yes, we need to make sure people don't feel they can just walk away with our business. Do you think we should reference that we need to maintain our current margin after location and Acquisition partners is paid? Maybe that is one addition at the end?

11/27/24 7:46:42 AM EST

➔ 2024-11-27 07:45:40: « Yes, we need to make sure people don't feel they can just walk away with our business. Do you think we should referen... »

yes.

11/27/24 7:47:44 AM EST

+17176291559

Add that and send back

11/27/24 7:50:00 AM EST

Dear Partner:

We appreciate your partnership to do what is necessary to continue to provide cash in light of our current situation with Cash Connect. To be clear, we are only temporarily allowing you to move terminals to other processors and create new TIDs so that we can secure Cash Connect cash only for these locations. For any other cash loading relationship outside of Cash Connect, the TIDs need to remain with Paramount's existing processors. In doing so, we need to be given login access to the terminals so we can properly account for this activity. ATMs, merchant agreements, revenue and any other asset remain property of Paramount Management Group. Also, we need to maintain existing costs and margin for these terminals so that we are directionally achieving our current margins. If you have any questions about this, please reach out to me.

11/27/24 7:50:32 AM EST

i think it will be impossible to get our current margins as we were buying better than most

11/27/24 7:51:46 AM EST

+17176291559

Understood. At least put them on notice for that.

11/27/24 7:52:03 AM EST

you ok with my messaging?

11/27/24 7:53:53 AM EST

+17176291559

Yea send asap. Thx!

11/27/24 7:54:40 AM EST

sent

11/27/24 8:08:56 AM EST

should I move forward trying to convert terminals to Sabah and others?

11/27/24 8:31:10 AM EST

+17176291559

Hang tight for a minute.

11/27/24 8:31:17 AM EST

+17176291559

How long will this take? How many terminals would it be?

11/27/24 8:31:27 AM EST

it would take a week to make the change

11/27/24 8:31:37 AM EST

or longer given the holiday

11/27/24 8:52:10 AM EST

Meeting with M&T bank in 10 minutes— they have 140 locations with us. Anything positive that I can give them? they have a 10 day out

11/27/24 8:55:44 AM EST

+17176291559

Their branding with us? Tell them we will have this resolved and I'm happy to get on the phone with them Friday or Monday.

11/27/24 8:55:56 AM EST

no. they are processing what us and getting cash from us.

11/27/24 8:56:00 AM EST

through cash connect

11/27/24 8:56:14 AM EST

their locations are shut down

11/27/24 8:56:34 AM EST

+17176291559

Can we move to someone else? That's bring those up under Saba today

11/27/24 8:56:41 AM EST

it will take at least 2 to 3 weeks to get them back and operating again given that challenges.

11/27/24 8:56:57 AM EST

of working with an FI. They need test transactions done first

11/27/24 8:57:09 AM EST

Tony Braglio just brought me up to speed on this.

11/27/24 8:57:29 AM EST

only saving grace is if cash connect relents

11/27/24 8:57:48 AM EST

I will move them to Sabah but doesn't look good.

11/27/24 8:58:05 AM EST

Tony told me that he is getting tons of cancellation notices

11/27/24 8:58:11 AM EST

in general.

11/27/24 8:59:15 AM EST

+17176291559

So there's no way for somebody to get these quickly or Charles. Like today or Friday?

11/27/24 8:59:38 AM EST

I don't know how.

11/27/24 9:00:07 AM EST

even Dave says new TIDs need to be create and cash needs to be ordered. This takes a long time to do. minimal f a week probably two

11/27/24 9:00:48 AM EST

I don't see how preserve any of this business

11/27/24 9:01:10 AM EST

cash loaders are quicker but even they are around a week to get in place.

11/27/24 9:51:47 AM EST

➔ Replying to you, 2024-11-27 06:27:41: « Good morning Daryl. First Premier is our ONLY source of cash for dispensary locations. They called S... »

please acknowledge that you saw this

11/27/24 10:25:07 AM EST

Daryl?

11/27/24 11:09:13 AM EST

can I say this to customers?

11/27/24 11:09:15 AM EST

To all Paramount partners and customers,

Due to a recent lawsuit and judgment between Paramount's owner and investors which has now been resolved, our provider of vault cash cancelled our agreement has begun to remove cash from our ATMs. We have other providers of cash to whom we are converting. We apologize for any issues you may experience during this time and want you to know that we are working diligently to resolve this as quickly as possible. If you have any questions or concerns, please reach out to us at the following:

11/27/24 11:10:28 AM EST

+17176291559

I'm literally on with fun managers and legal right now. When you say it's been resolved and the first sentence that is not accurate until we pay them.

11/27/24 11:10:54 AM EST

ok. i won't use this language. I thought it might be finished by now.

11/27/24 11:11:23 AM EST

modified

11/27/24 11:11:24 AM EST

Due to a recent lawsuit and judgment between Paramount's owner and investors, our provider of vault cash cancelled our agreement has begun to remove cash from our ATMs. We have other providers of cash to whom we are converting. We apologize for any issues you may experience during this time and want you to know that we are working diligently to resolve this as quickly as possible. If you have any questions or concerns, please reach out to us at the following:

11/27/24 11:11:33 AM EST

do i have your blessing on this?

11/27/24 11:28:41 AM EST

Just found out that CDS is holding all of our surcharge, not sending it to us anymore. Not sure why. We think it's because of the notice that Cash Connect sent to them.

11/27/24 11:29:16 AM EST

We are doing further research, but we are completely and utterly out of cash

11/27/24 11:55:16 AM EST

+17176291559

They can't do that! Call them. They are unrelated. We need answers from CDS asap

11/27/24 11:56:06 AM EST

Steve is reaching out to get answers.

11/27/24 11:56:08 AM EST

+17176291559

I would send this. Changed my menus first sentence

Due to a recent lawsuit and judgment between Paramount's owner and investors, one of our providers of vault cash cancelled our agreement has begun to remove cash from our ATMs. We have other providers of cash to whom we are converting. We apologize for any issues you may experience during this time and want you to know that we are working diligently to resolve this as quickly as possible. If you have any questions or concerns, please reach out to us at the following:



11/27/24 11:56:19 AM EST

+17176291559

➔ Replying to you, 2024-11-27 11:56:06: « Steve is reaching out to get answers. »

So nothing came in today?

11/27/24 11:56:25 AM EST

+17176291559

➔ Replying to you, 2024-11-27 11:56:06: « Steve is reaching out to get answers. »

Cash connect could not be related to that

11/27/24 11:56:33 AM EST

+17176291559

➔ Replying to you, 2024-11-27 11:56:06: « Steve is reaching out to get answers. »

I'm wondering if it's some thing from the superior situation

11/27/24 11:56:37 AM EST

We got cash today but we won't get anything on Friday

11/27/24 11:56:55 AM EST

+17176291559

We need to know what it is so I can get it resolved ASAP

11/27/24 11:57:15 AM EST

Agreed.

11/27/24 11:57:30 AM EST

Liked "I would send this. Changed my menus first sentence..."

11/27/24 11:58:12 AM EST

➔ Replying to you, 2024-11-27 06:27:41: « Good morning Daryl. First Premier is our ONLY source of cash for dispensary locations. They called S... »

Do you want to be on the call today with them?

11/27/24 12:13:43 PM EST

Daryl they are pressuring us for a call. Should I assume you don't want to be on that call with First Premier?

11/27/24 12:15:25 PM EST

+17176291559

I'm dealing with the investor situation on calls. Can we just provide them an update that this is going to be resolved and if you owe unable to provide them what they need on the car I can try to get to them later today or Friday.

11/27/24 12:30:42 PM EST

+17176291559

Need to find out about CDS asap. Who is putting on hold?

11/27/24 12:30:46 PM EST

+17176291559

Please reach out to them

11/27/24 12:31:07 PM EST

on it.

11/27/24 12:35:57 PM EST

+17176291559

If this is phonics, I can get it removed ASAP. I don't know how it could be anything like cash connect.

11/27/24 12:36:35 PM EST

i reached out and am awaiting a response. The reason I think it's cash connect is because of the following letter

11/27/24 12:37:14 PM EST

Randall - our team will begin reviewing and assessing this request. Given the Thanksgiving holiday, we will not be able to render a decision regarding this request this week.

Additionally, we received a letter from Cash Connect this morning as it relates to our tri-party agreement directing that any changes for terminals using their services must be requested by them. With this said, in addition to our own internal approval, we will need Cash Connect's authorization to move those specific TIDs. We will request that approval from them and keep you posted.

Best regards,  
Bryan

Bryan Bauer  
GM, CDS IS

11/27/24 12:38:16 PM EST

+17176291559

Well, it still has to come through them and that would not be a reason for a hold. I fear it's something else.

11/27/24 12:38:25 PM EST

Yes. Me too

11/27/24 12:43:02 PM EST

called, texted, emailed everyone trying to get an answer. will let you know when I know

11/27/24 1:01:13 PM EST

Steve talked to first premier they're cool for now but want to talk to you soon

11/27/24 1:02:01 PM EST

PA Turnpike called me. They're gonna need to publish something on their website and maybe in the news about ATMs not being available. They're gonna propose something.

11/27/24 1:02:25 PM EST

They didn't say in the news I'm just assuming they may do that

11/27/24 1:02:57 PM EST

+17176291559

Can you quickly find out about CDS situation so I can get it resolved?

11/27/24 1:03:15 PM EST

Yes, we've called everyone we can I even texted. We don't know how to get an answer until they respond.

11/27/24 1:03:30 PM EST

+17176291559

How did you find out about it? What did they send you?

11/27/24 1:03:42 PM EST

We just noticed that our settlement accounts were changed today

11/27/24 1:03:48 PM EST (Edited 11/27/24 1:03:57 PM EST)

Our people internally noticed the change

Edited

11/27/24 1:04:10 PM EST

+17176291559

Is that how it happened when we had this occur with Square?

11/27/24 1:04:20 PM EST

No, we were given notice in advance

11/27/24 1:04:29 PM EST

They notified us then made the change at the same time

11/27/24 1:04:55 PM EST

That's why I think it's a Cash Connect thing plus Cash Connect is due \$2M today my guess is they're holding that for them

11/27/24 1:14:25 PM EST

+17176291559

They can't hold 2 million for cash connect. They can't put restraints in our accounts. That's not possible legally.

11/27/24 1:15:35 PM EST

That what I think. But getting NO response from CDS

11/27/24 2:34:02 PM EST

Seeyour inbox

11/27/24 2:34:26 PM EST

CDS issue issue over Cash Connect

11/27/24 2:34:32 PM EST

And the investor thing is breach of their agreement as well

11/27/24 2:47:49 PM EST

+17176291559

This is fucking ridiculous. Can we have Sasha quickly look at this and see what we can do to counter it. I can push to John as well to see if he will bring this back.

It sounds like if we just show them the ATMs are with Saba or Charles or someone it would open it up ? I'm reading the last paragraph.

11/27/24 2:48:46 PM EST

We can get Sash to look at it but at this point, I have no agreement with Dave Charles or Sabah. Saba will be our best option. And there's no way that they're gonna back down just because she sent a legal letter to them.

11/27/24 2:49:31 PM EST

If you need Sasha's take on it, I'm sure I can get that but The past experience with them is that they will stick to whatever they have decided

11/27/24 2:50:02 PM EST

Saba is getting me a draft agreement today. I just met with him this morning. We are planning to reprogram all the ATMs, but their claim is more to Cash Connect than it is to their agreement.

11/27/24 2:50:17 PM EST

+17176291559

So when we find out from Nic, if moving to Sabau, Charles is an interim plan

Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.net, +17179175670, randall.leanman@paramountmgp.com, +17179172753

11/27/24 2:51:24 PM EST

Not following what you're asking her

11/27/24 2:51:27 PM EST

Here

11/27/24 2:53:09 PM EST

So CDS is going to argue that by the investors taking over the ATMs, they have no direct agreement with them and cannot process for them. Which is the same argument that Cash Connect used.

11/27/24 2:55:22 PM EST

So the investors have to have their own relationships ready to go if they are taking over this book of business

11/27/24 2:56:58 PM EST

All I can say is you gotta close this thing. until it's closed this kind of stuff is gonna be happening daily

11/27/24 2:58:44 PM EST

+17176291559

I know Randall. And these things make it that much more difficult. We have a call coming up where I need to disclose this. I'm wondering if it's time to turn this over in a creative way and then bring you in to Margo and build that back up which seems to have all the potential

11/27/24 2:59:00 PM EST

Yes, please get me out of here :-)

11/27/24 2:59:16 PM EST

I want nothing more than to be out of this ATM business. I would love to know that Friday is my last day.

11/27/24 3:00:39 PM EST

I'm just to the point that I can't take it anymore and it's impacting my health. I'm literally fighting recurring panic attacks with every email and phone call.

11/27/24 3:01:04 PM EST

+17176291559

You don't deserve this

11/27/24 3:01:07 PM EST

Like this type of notice, I just sitting here right now trying to calm myself down

11/27/24 3:01:16 PM EST

I agree I'm so done. It's not even funny.

11/27/24 3:01:32 PM EST

+17176291559

I need to have a couple cocktails tomorrow and put a plan together that turns this over. I just don't know how this most recent letter is going to allow funding today or Friday, but hopefully I'm wrong.

11/27/24 3:01:43 PM EST

+17176291559

I will get you away from Paramount

11/27/24 3:01:45 PM EST

Jesus

11/27/24 3:03:02 PM EST

Can't we just promise to cure the breach?

11/27/24 3:03:16 PM EST

Close this thing out and put money in reserve to cure it. I think it's all it's gonna take.

11/27/24 3:04:23 PM EST

I'm assuming there's not enough funds just to pay them cash for their side and just take Paramount into bankruptcy?

11/27/24 3:04:47 PM EST

Maybe just turn it all over to Dave Charles and let him give us dollars based on a multiple of GP at some point in the future?

11/27/24 3:04:52 PM EST

He could step in and cure all of this in a heartbeat

11/27/24 3:06:21 PM EST (Edited 11/27/24 3:07:18 PM EST)

I think if you try to figure out a way to value this biz get investors satisfied and they get inside this absolute train wreck i think they're just gonna trip

Edited

11/27/24 3:07:29 PM EST

Are you able to just take them out with cash now? And deal with Paramount later?

11/27/24 3:08:24 PM EST

I want to resign on Friday if I can

11/27/24 3:09:34 PM EST

Please.

11/27/24 3:16:18 PM EST

Guaranteed if you don't close today or Friday at the very latest, there will be multiple collapsing, major vendors following next week and you'll never close

11/27/24 3:16:46 PM EST

First premier, other processors etc. unless you absolutely want to destroy this company and any value that it has you gotta get this thing closed now.

11/27/24 3:17:41 PM EST

+17176291559

I need to get my head around this tonight and tomorrow morning and can give you my suggestion tomorrow afternoon. I will get this behind us.

11/27/24 3:18:04 PM EST

OK, please I'm begging you to get me out of here

11/27/24 3:27:19 PM EST

Whatever you do just keep it simple enough so it can close on Friday.

11/27/24 3:36:13 PM EST

So here's another issue we couldn't pay the rent for the customer so they are holding the ATMs and cash connect cash hostage.



11/27/24 3:37:05 PM EST

See email from Torosian.

11/27/24 3:37:10 PM EST

This will not stop.

11/27/24 3:38:20 PM EST

Friday must be my last day at Paramount.

11/27/24 3:42:40 PM EST

I'm happy to start at Margo after a week of recovery

11/27/24 3:54:25 PM EST

Maybe two weeks.

11/27/24 4:47:20 PM EST

Daryl Im sorry to let you down but it's over for me. I am having some mental health issues around all of this and cannot go on.

11/27/24 4:47:54 PM EST

+17176291559

You're not letting me down.

11/27/24 4:48:05 PM EST

+17176291559

We talked to the legal Council at NCR and I think we have them turning it back on.

11/27/24 4:48:11 PM EST

+17176291559

I'll know tomorrow

11/27/24 4:48:28 PM EST

Ok. I'm sorry but I'm emotionally exhausted.

11/27/24 4:48:49 PM EST

+17176291559

I totally understand.

11/27/24 4:48:53 PM EST

+17176291559

You deserve better

11/27/24 4:49:10 PM EST

+17176291559

Let's re-huddle late tomorrow or Friday morning

11/27/24 4:49:30 PM EST

I will happily talk to you at any time day or night.

11/28/24 10:43:44 AM EST

See email from PA turnpike.

11/28/24 11:51:01 PM EST

+17176291559

Happy Thanksgiving, Randall. I'm sorry it's been such a tough year and I take full responsibility for it. I appreciate you and appreciate your love. And, I appreciate your support and loyalty.

11/28/24 11:52:04 PM EST

Thanks Daryl. I feel the same. I hope you had a good day.

11/29/24 8:04:29 AM EST

Good morning Daryl — What are your thoughts on closing with investors today? Also, I'd like to create a similar resignation arrangement that Dennis created except that I plan to return in another capacity in the new year. Do you have someone in mind for coverage for me?

11/29/24 8:04:47 AM EST

I'm happy to talk in person or over the phone if you prefer.

11/29/24 8:16:19 AM EST

+17176291559

GM! we are speaking again to ncr legal and trying to get them to reverse decision. If so. There's an outside chance we can still fund today.

11/29/24 8:16:28 AM EST

Ok

11/29/24 8:17:06 AM EST

+17176291559

If not. We will need to comply with giving information to turnover the company and I have multiple plans to discuss. I'm telling everyone we're closed today but we will have to provide them information ASAP if we go this route.

11/29/24 8:21:16 AM EST

ok.

11/29/24 8:21:32 AM EST

do you have someone to cover for me?

11/29/24 8:30:02 AM EST

+17176291559

What do you mean? If we fund it and end the lawsuits?

11/29/24 8:30:21 AM EST

+17176291559

If we turn over to them, we're just gonna have to give them information. I'm developing multiple plans today.

11/29/24 8:32:00 AM EST

➔ Replying to you, 2024-11-27 16:47:20: « Daryl Im sorry to let you down but it's over for me. I am having some mental health issues around a... »

This is what I'm dealing with. Had a breakdown on Wednesday.

11/29/24 8:38:16 AM EST

+17176291559

I'm sorry you're in this position randall. I can definitely accept the resignation however we were certainly needed to turnover certain pieces of information if we go this route. we need to chat as soon as the picture is clear which it should be sometime later today

11/29/24 8:40:36 AM EST

understood. I'd prefer to talk as well. Let's chat when the picture is clearer today as it all looks overwhelming to me at the moment.

11/29/24 8:42:19 AM EST

I just need a little time to recover and clear my head but I need someone to shoulder some of this responsibility for me for a bit

11/29/24 8:44:15 AM EST

+17176291559

Liked "I just need a little time to recover and clear my ..."

11/29/24 10:00:55 AM EST

Daryl, I took some time to reflect this morning on why I am feeling the way I'm feeling and thought it might help for you to see life at Paramount from my perspective.

11/29/24 10:01:13 AM EST

I had a dream yesterday that I was carrying a beautiful baby and climbing a ladder high up in the air. Just as I was nearing the top I realized that I was out of strength and not only was I not able to save the baby but I feared I was not going to be able to save myself. I tried yelling for help that was too far off in the distance to respond quickly enough but didn't even have the strength to do that. I woke up in a panic, heart racing etc.

As I reflected on this, I thought about what is causing me to feel this way:

1. Eight months of telling employees, friends/family, partners, customers and suppliers that we have a plan and are going to be ok. Each deadline that passes increases the stress on me and them and decreases their confidence.
2. No cash
  - a. I can't implement a plan to save accounts from Cash Connect de-cash. We need money for locks, techs, etc. to make the change.
  - b. Losing customers because we haven't paid customers in over three months.
  - c. People pleading with me for cash so they can pay their mortgages and provide for their families that I must ignore.
  - d. Making and breaking promises to pay.
  - e. I've been allowing Paramount to charge to my personal credit card and fear this will not be paid back \$125k as of today
  - f. Personally guaranteeing Orrstown loan. Joint and several \$1.8M in exposure.
  - g. Fearing whatever else is yet to come in lawsuits where I will be named or need to testify and spending huge amounts on legal fees to defend myself personally.
  - h. FNB grabbing our cash to satisfy their LOC.
3. Daily/weekly lawsuits and surprises (processors holding payments, PAI shutting us down, Ray Davis, Samantha etc.) that reduce our ability to act to the point that we are now powerless and motionless. I wake up each day fearing what I'm going to get in the mail when I go to the mailbox. (PA Turnpike is next)

4. Superior garnishing accounts (still don't have \$87k back from Coinbase). Fearing I wouldn't be able to pay bills and having nothing for retirement. They actually hired a private investigator to dig on us. I saw them taking photos of our house and beach house. Feel that my privacy was violated.
5. The public nature of all of this. Aside from Lancaster Online and Reddit, family told me yesterday that PA Turnpike announced this on WGAL news.
6. Feel the humiliation of all this to the point that my wife suggested that we sell our house and move out of the area.
7. Sending a sheriff to our house who served my parents.
8. Humiliation in the ATM industry – Not allowing us to participate in the NAC show and knowing that we are considered a bad company in the industry and my personal reputation is associated with this.
9. Lack of communication with Daryl. Cryptic text messages that I have difficulty deciphering. Trying to get him to talk to me. Have not talked in over 2 months.
10. Feeling that Daryl doesn't understand the desperate nature of what we are dealing with on a daily basis.
11. Fearing that all of Daryl's personal guarantees and commitments are significantly over his ability to fund and that he will need to file for personal bankruptcy. Making commitments to bring in cash that don't materialize.
12. Daryl's willingness to put us in harm's way with Superior as personal guarantors.
13. Knowing the FBI is investigating all of this and fearing what could come from this.
14. Scared employees looking to me for answers that I don't have and realizing that I can do nothing to convince them to stay.
  - a. I told my son Evan to start looking for a job on Thanksgiving Day.
15. Constant changing of investor funding date and no end in sight and worried that there will be additional lawsuits from them, customers, suppliers, etc for the foreseeable future.
16. I feel like I'm letting everyone down.

11/29/24 10:16:17 AM EST

just got this from a partner moments ago

11/29/24 10:16:18 AM EST

Hope you and Darrel can sleep at night knowing your scammed everyone

11/29/24 10:27:15 AM EST

I can do nothing to save the cash connect accounts. we need locks which we cannot purchase and maintenance companies to shelve off the existing locks and they won't help us due to lack of payment.

11/29/24 10:53:10 AM EST

+17176291559

➔ Replying to you, 2024-11-29 10:01:13: « I had a dream yesterday that I was carrying a beautiful baby and climbing a ladder high up in the air.... »

Ty - I will respond.

11/29/24 10:53:30 AM EST

+17176291559

➔ Replying to you, 2024-11-29 10:16:17: « just got this from a partner moments ago »

What partner? Do you want me to call them?

11/29/24 10:53:48 AM EST

➔ Replying to you, 2024-11-29 10:01:13: « I had a dream yesterday that I was carrying a beautiful baby and climbing a ladder high up in the air.... »

Greg Fabiani.

11/29/24 10:54:04 AM EST

+17176291559

➔ Replying to you, 2024-11-29 10:27:15: « I can do nothing to save the cash connect accounts. we need locks which we cannot purchase and mainten... »

So that is needed for the Saba or David Charles strategy or if we try to move to another one of our cash providers

11/29/24 10:54:54 AM EST

➔ Replying to you, 2024-11-29 10:01:13: « I had a dream yesterday that I was carrying a beautiful baby and climbing a ladder high up in the air.... »

I don't think it's necessary at this point. I think just need to fix this and put it behind us. Conversation won't do anything at this point. Just action.

11/29/24 10:55:42 AM EST

➔ Replying to you, 2024-11-29 10:27:15: « I can do nothing to save the cash connect accounts. we need locks which we cannot purchase and mainten... »

Correct. Neither of them can do anything if we can't get access to locks.

11/29/24 10:56:10 AM EST

➔ Replying to you, 2024-11-29 10:27:15: « I can do nothing to save the cash connect accounts. we need locks which we cannot purchase and mainten... »

Armored carriers are also an option to get back out there, but they're so busy taking care of Cash Connect that they can't go back and unlock for days or longer

11/29/24 10:57:15 AM EST

So far only ASI has communicated this, but I'm sure we will encounter this with anybody else that we use

11/29/24 10:57:28 AM EST

As we are at cut off for just about everybody

11/29/24 10:59:09 AM EST

The only other option we have is to send locksmiths out to drill locks but that costs about \$1k per lock but we don't have replacement locks to send out.

11/29/24 11:03:37 AM EST

+17176291559

So maintenance companies have access to the locks and armored reach ATM?

11/29/24 11:04:58 AM EST

Yes, maintenance companies have access to Locks as do the armored. Because armored can't get back we were going to send maintenance companies, but they're telling us they cannot go out because we haven't paid them.

11/29/24 11:05:30 AM EST

At least ASI is telling us this but we know the message will be the same for the rest of our maintenance providers

Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.  
net, +17179175670, randall.leanman@paramountmgp.com, +17179172753

11/29/24 11:05:40 AM EST

Everybody knows we're in financial difficulty

11/29/24 12:17:40 PM EST

Any luck with CDS?

Text message

11/29/24 12:46:50 PM EST (Edited 11/29/24 12:47:01 PM EST)

FYI. Team is finding solutions around issues. So this issue might not be  
as widespread as I thought.

Edited

iMessage

11/29/24 1:51:45 PM EST

+17176291559

Awesome!

11/29/24 1:59:01 PM EST

+17176291559

Can you tell me what the plan is?

11/29/24 2:01:39 PM EST

The plan is that we are finding other companies like ATM of America who are able to use existing lock cause they're using the same armored provider and same cash. They're not running into the same problems they're able to direct armored more quickly than others. However, in all situations, they are taking a significant portion of our margin to do so. Looks like about 25 to 30% from what I can tell just quickly looking at it.

11/29/24 2:01:57 PM EST

National link is another provider

11/29/24 2:02:08 PM EST

+17176291559

So they're taking over cash connect ATMs?

11/29/24 2:02:30 PM EST

We are talking to national Link and to ATM America. It looks like ATM of America's rates are maybe a little better not 100% sure it's very early on.



11/29/24 2:02:36 PM EST

We're just going to wherever we can go to find somebody to take over

11/29/24 2:02:48 PM EST

That has an existing relationship with Cash Connect

11/29/24 2:03:44 PM EST

+17176291559

Just have them take over and make sure that these relationship  
relationships can be unwound if we want them to be

11/29/24 2:03:54 PM EST

+17176291559

Does that mean the surcharge would go to them and not to us?

11/29/24 2:04:01 PM EST (Edited 11/29/24 2:04:13 PM EST)

Yes, trying to negotiate on that now ATM of America wants 24 months  
minimum and try to get it to 12

Edited

11/29/24 2:04:28 PM EST

+17176291559

It has to be month-to-month. We can't go long-term. We could potentially  
pay a breakup fee or something. Let's just have them take it over with no  
contract at this point. As long as we still control it to take back.

11/29/24 2:04:44 PM EST

OK, see what I can do

11/29/24 2:05:07 PM EST

+17176291559

If we turn it over to the fun managers, we can't have just signed a  
contract

11/29/24 2:05:22 PM EST

+17176291559

Let's just get it up with no agreement, but a commitment on the margin  
share

11/29/24 2:06:04 PM EST

OK, well if we know that we're returning over to the fund managers that will be today I won't have anything signed before Monday

11/29/24 2:06:16 PM EST

So we can let them figure out what they wanna do after this correct?

11/29/24 2:08:18 PM EST

+17176291559

Definitely don't tell them that. I'm still trying to fund us. I'm just saying I don't want to wake up to that worst case reality. I'm putting plans together tonight and throughout the weekend and will share with you.

11/29/24 2:09:28 PM EST

OK, yes I won't say anything to anyone just thinking that this will be known very soon and that will guide us and how we craft the agreements.

11/29/24 3:07:36 PM EST

+17176291559

Did we lose the turnpike business? I was on my phone and could not see the email?

11/29/24 3:08:05 PM EST

I don't know they didn't say I'm sure I'm getting a letter soon

11/29/24 5:26:25 PM EST

So do we turn over the entire company to them on Monday or just some ATMs?

11/29/24 5:26:43 PM EST

If just ATMs - how many?

11/30/24 8:21:30 AM EST

Good morning Daryl. Will you please let me know what is happening on Monday?

11/30/24 8:24:25 AM EST

Please just respond so I know you are ok

11/30/24 9:15:42 AM EST

+17176291559

Sorry, this is the annual first day of PA hunting with my dad and brother and all my nephews. In the woods and have a limited to no service. I'll get back to you.

11/30/24 9:15:56 AM EST

Thanks.

11/30/24 4:43:11 PM EST

Hope you had a good day hunting. Just checking in to see what I can expect for Monday.

12/1/24 2:42:39 PM EST

Also any thoughts on when I will get paid for my stock?

12/1/24 10:47:53 PM EST

+17176291559

Just seeing these as I do an annual hunting trip with my 82 year old father, my son, my brother, brother-in-law and nephews the weekend after Thanksgiving. Limited to no phone service most of the places we're hunting. I'm trying to figure out a plan. I'll be up tomorrow early working on it and also be back tomorrow. We're working to get CDS to release and Matt has been in contact with them over the weekend.

12/1/24 10:50:49 PM EST

Who is Matt?

12/1/24 10:51:23 PM EST

I thought we had a court order to turn over assets tomorrow ?

12/1/24 11:23:17 PM EST

This doesn't make any sense to me.

12/2/24 7:55:02 AM EST

+17176291559

Sorry, I was delirious tired when I sent that.

Matt is one of our attorneys

I still was hoping to get both of these released/resolved so we can get payoff

If we don't pay, yes, we need a turnover and I've been working multiple plans. Be back w more.

12/2/24 7:55:18 AM EST

Liked "Sorry, I was delirious tired when I sent that.  
M..."

12/2/24 9:53:45 AM EST

Don't know if you saw but we are bouncing checks

12/2/24 10:26:55 AM EST

Also we need to pay various maintenance providers so they will help us convert the cash connect terminals. Right now some are refusing.

12/2/24 10:27:19 AM EST

Pa Turnpike is on that list.

12/2/24 10:31:48 AM EST

+17176291559

Just seeing. How much?

12/2/24 10:32:21 AM EST

+17176291559

How much still comes into first regents and powerqwewt?

12/2/24 10:32:34 AM EST

+17176291559

Don't make the orrstown debt payment until resolved

12/2/24 10:33:41 AM EST

Daryl is saying to hold on making Orrstown debt payment.

12/2/24 10:37:51 AM EST

We need at least \$100k today

12/2/24 10:39:10 AM EST

If you want to save a major customer we need \$120k additional.

12/2/24 10:46:51 AM EST

Deadline for that customer is today

12/2/24 11:07:44 AM EST

Daryl — I need to know what we are doing with investors and ATMs. If we are turning over to them, I need time for our people to do what is necessary. Want to also be sure we don't have any terminals on the list that were sold to Dave Charles or John Barnard.

12/2/24 11:08:12 AM EST

we cannot go to the last minute and expect to have time to comply with the court order.

12/2/24 11:42:08 AM EST

I need to talk to you so I know what's going on .

12/2/24 11:56:24 AM EST

just received notice that Mid Florida our armored provider for cannabis loading is stopping today if we don't pay \$136k past due by wire.

12/2/24 11:56:30 AM EST

today

12/2/24 11:57:05 AM EST

+17176291559

I'm on with legal. Trying to get CDS resolved.

12/2/24 11:57:14 AM EST

+17176291559

Hang tight

12/2/24 11:57:18 AM EST

ok

12/2/24 12:25:14 PM EST

We also need cash for beach house mortgage payment

12/2/24 12:46:51 PM EST

I have to be on the road at 3 to take my son and daughter in law to the airport. What is the decision regarding turning over the terminals?

12/2/24 1:23:56 PM EST

+17176291559

Working to resolve hang tight

12/2/24 1:24:09 PM EST

+17176291559

We can start gathering certain information as a back up and I'm sending it to you shortly. I'm still with legal.

12/2/24 1:24:17 PM EST

Ok.

12/2/24 1:24:23 PM EST

What about cash today?

12/2/24 1:31:30 PM EST

➔ 2024-12-02 13:24:09: « We can start gathering certain information as a back up and I'm sending it to you shortly. I'm still with legal. »

please send asap

12/2/24 1:38:20 PM EST

+17176291559

I'm trying to do it. We're working with Nick at NCR right now. See email to go John as well We'll get you everything in a few minutes.

12/2/24 1:38:35 PM EST

Need cash for health insurance.

12/2/24 1:38:54 PM EST

Otherwise I need to notify employees that they don't have coverage

12/2/24 1:39:27 PM EST

Is that what you want me to do?

12/2/24 1:39:51 PM EST

Emphasized "Otherwise I need to notify employees that they don..."

12/2/24 2:28:00 PM EST

Clatworthy is not allowing us to use their cash anywhere. he just communicated this to multiple parties. I just spoke to ATM of America. He said that John's concern is that ownership of the ATMs is no longer Paramount (or will change soon) and that the investors — whomever they are need to agree to the terms of the agreement that we are creating with the various parties. THIS IS CAUSING US FURTHER DELAYS FOR ALL DOWN TERMINALS.

12/2/24 2:28:38 PM EST

Sabah of ATM of America asked if there is an investor representative that he can talk to get them to agree to the terms of his agreement.

12/2/24 2:28:57 PM EST

and sign off on this so we can move forward

12/2/24 2:29:36 PM EST

+17176291559

I just spoke to John and he's providing a clarification back to CDs That will hopefully get our surcharges out.

I'm hitting send to an email right now so please read it

12/2/24 2:29:55 PM EST

ok.

12/2/24 2:31:25 PM EST

does this mean you can close with investors and we retain the terminals?

12/2/24 2:31:51 PM EST (Edited 12/2/24 2:34:17 PM EST)

which would allow us to continue with Clatworthy for cash provision?

Edited

12/2/24 2:35:44 PM EST

+17176291559

➔ Replying to you, 2024-12-02 14:31:51: « which would allow us to continue with Clatworthy for cash provision? »

Praying bleeding. You see my email as we don't have a big requirement of how to turn things over. We don't have to give them all the information we've given to others.

12/2/24 2:36:22 PM EST

don't see an email yet

12/2/24 2:37:38 PM EST

Emphasized "don't see an email yet"

12/2/24 2:39:19 PM EST

hello — no email. please resend

12/2/24 2:40:09 PM EST

just received it.

12/2/24 2:41:57 PM EST

+17176291559

It's really just pulling down our agreements, etc. We don't even have to turn modems over to us. This is what's in the stipulation. Doesn't even require us to turn over addresses, etc. Let's start pulling on this list with the exception of locations agreement, which will take a long time. Let's get all the vendor agreements that we use for cogs and ATM, passwords and combinations and any permits, etc.

12/2/24 2:42:04 PM EST

I need help gathering this information. Do you want all location agreements ready to go? this will take days to gather.

12/2/24 2:42:09 PM EST

+17176291559

We can then do a document that states we turn over any right title or interest



12/2/24 2:42:17 PM EST

+17176291559

➔ Replying to you, 2024-12-02 14:42:04: « I need help gathering this information. Do you want all location agreements ready to go? this will tak... »

I just responded to this

12/2/24 2:42:43 PM EST

+17176291559

Right now, I would focus in on number three number four, if applicable and number five. I can do number one. Number two we can do later.

12/2/24 2:43:07 PM EST

got it.

12/2/24 2:45:51 PM EST

so are we definitely turning these over or are we still considering this to be a back up action

12/2/24 2:46:27 PM EST

+17176291559

No! Just back up

12/2/24 2:46:32 PM EST

ok

12/2/24 2:46:37 PM EST

+17176291559

Clarify that

12/2/24 2:46:47 PM EST

+17176291559

Ask everything that you send out to be confidential. I would only put this to a couple people.

12/2/24 3:46:35 PM EST

Hello Daryl, any updates on investor funding?

Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

12/2/24 4:28:33 PM EST

I presume it is not going to occur.

12/2/24 4:57:24 PM EST

+17176291559

We are in with CDS counsel.

12/2/24 4:57:38 PM EST

Ok

12/2/24 5:13:25 PM EST

Please call me when you are off that call.

12/2/24 5:38:23 PM EST

I must talk to you tonight if you expect me to continue doing my job

12/2/24 6:17:41 PM EST

Daryl, just so you know we have no cash Solutions now. Clatworthy shut everybody down.

12/2/24 6:18:44 PM EST

Just got off the phone with Mike Powell and he said that they want nothing to do with Daryl Heller and Randall Leaman anymore and prestige

12/2/24 6:20:11 PM EST

+17176291559

➔ Replying to you, 2024-12-02 17:38:23: « I must talk to you tonight if you expect me to continue doing my job »

I will. I am with Matt, Richard and Rory

12/2/24 6:21:18 PM EST

+17176291559

➔ Replying to you, 2024-12-02 18:17:41: « Daryl, just so you know we have no cash Solutions now. Clatworthy shut everybody down. »

What does that mean? Those ATMs cant go through a Sabah or Charles with him? Rather other cash providers?

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

12/2/24 6:21:36 PM EST

+17176291559

➔ Replying to you, 2024-12-02 18:18:44: « Just got off the phone with Mike Powell and he said that they want nothing to do with Daryl Heller and... »

Who is they? Mike or Cash Connect?

12/2/24 6:22:42 PM EST

The "they" is Cash Connect

12/2/24 6:23:09 PM EST

➔ Replying to you, 2024-12-02 18:17:41: « Daryl, just so you know we have no cash Solutions now. Clatworthy shut everybody down. »

Correct

12/2/24 6:23:43 PM EST

We are hearing the same message everywhere

12/2/24 8:51:51 PM EST

+17176291559

Not ignoring. With Rory and fund managers

12/2/24 8:52:09 PM EST

Ok. Whom is Rory?

12/2/24 9:00:42 PM EST

+17176291559

Rory is attorney for find managers

12/2/24 9:00:49 PM EST

Ok

12/3/24 6:39:29 AM EST (Edited 12/3/24 6:51:31 AM EST)

Good morning Daryl,

For the reasons i shared previously and more that have occurred since. Today must be my last day at Paramount. I am still willing to work with you in another capacity but need a little time to recover. Will you please approve the following severance package?

Personal guarantee:

12 month severance at current comp

Pay cobra

Transfer company car to me

Pay my credit card - \$110k

Pay my stock - \$1M by Friday - balance in 12 months

Beach house — I will work to sell and put balance toward my stock. You keep making mortgage payment.

Does this work for you?

Edited

12/3/24 6:54:01 AM EST

Severance can go away when I start working for you again.

12/3/24 7:49:35 AM EST

Daryl are you seeing this?

12/3/24 8:00:23 AM EST

+17176291559

Just now. Can you talk late morning?

12/3/24 8:00:35 AM EST

Yes.

12/3/24 8:00:55 AM EST

What time?

12/3/24 8:02:27 AM EST

I have company meeting scheduled today which I will cancel for the second time. Cancelling the rest of my meetings and putting vacation notices up on email.

12/3/24 8:02:48 AM EST

And phone. I am cooked.

12/3/24 8:02:55 AM EST

+17176291559

What time is company meeting?

12/3/24 8:03:14 AM EST

+17176291559

We need to put a strategy together on communication plan and narrative

12/3/24 8:03:25 AM EST

2 pm

12/3/24 8:04:03 AM EST

+17176291559

Let's not cancel yet

12/3/24 8:04:26 AM EST

Ok

12/3/24 8:37:14 AM EST

Powell wants to purchase First Regents from us. He wants to forgo his ripcord option which pays 9 multiple for average last 12 months of GP ( $\$117,735 \times 9 = \$1,059,623$ ) plus take over the Orrstown Note. which is about \$1.26M. This will allow him to get cash from CashConnect as we are no longer the owners. So,  $\$1,059,623 + \$1,260,000 = \$2,319,623.00 / 117,735 = 19.8$  multiple. plus we will assign building lease and employees, etc. to him which will save SG&A. We need to decided now as he is on borrowed time for the machines being out of cash.

12/3/24 8:42:27 AM EST

by the way, I asked Coinbase to restore your funds so let me know if you don't get it soon.

12/3/24 9:03:53 AM EST

what time can we talk?

12/3/24 10:02:08 AM EST

+17176291559

Can you send me a transition plan to Daryl F Heller @gmail.com. I'm really panicked on how to handle transition with your departure and concerned about a mass exodus. Also, what is the communication message to the team?

12/3/24 10:03:38 AM EST

Mass exodus is already underway.

12/3/24 10:04:49 AM EST

Who were the investors bringing in to run their portfolios? Can that person take over?

12/3/24 10:06:41 AM EST

everyone knows the following: 1. we aren't paying providers and they are shutting us off. 2. we have no solution for cash connect so all of these terminals are going away. 3. We haven't paid customers in over 3 months. So, my presence will make little difference.

12/3/24 10:08:53 AM EST

the word is out that people will be out of jobs very soon

12/3/24 10:14:18 AM EST

I am emotionally and mentally worn out. i'm not well. I'm exhausted from carrying this burden for the last 9 months.

12/3/24 10:15:15 AM EST

you haven't talked to me in 2 months. Every week another bomb drops.

12/3/24 10:19:46 AM EST

i feel like I've been carrying this alone as I'm the one talking to everyone and trying to decipher what you are doing and what is happening and trying to bring comfort where I can. But I've been on my own here and no one believes me any more as they don't think you are going to succeed in refinancing.

12/3/24 10:20:25 AM EST

so I know the mass exodus is occurring in finance

12/3/24 10:21:10 AM EST

+17176291559

I understand Randall. We hung up our last call at 11:30 last night which seems like every night. I talk to you many times every day is ye t but have not met with you since October with Dennis.

I know I've failed you and I fully recognize that. 100% of my energy is focused on getting this bailed out so we can get it behind us but a day turns into a week and a week turns into a month. It's been crippling.

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.  
net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

12/3/24 10:22:33 AM EST

right now, I see no path for Paramount's survival

12/3/24 10:22:48 AM EST

I think the best thing is to put into dissolution.

12/3/24 10:23:27 AM EST

then you don't need to pay Samantha or Ray Davis or the host of others

12/3/24 10:27:32 AM EST

➔ Replying to you, 2024-12-03 08:37:14: « Powell wants to purchase First Regents from us. He wants to forgo his ripcord option which pays 9 mult... »

thoughts on this? we need to make a decision now as we are out of time

12/3/24 10:29:35 AM EST

➔ 2024-12-03 10:21:10: « I understand Randall. We hung up our last call at 11:30 last night which seems like every night. I talk to you many tim... »

to be clear — we don't talk. we communicate by text which is difficult for me to ask questions and understand what is happening.

12/3/24 10:35:23 AM EST

so when can we talk?

12/3/24 10:36:04 AM EST

+17176291559

I understand

12/3/24 10:36:12 AM EST

+17176291559

At 1130?

12/3/24 10:36:28 AM EST

works for me. Thanks

12/3/24 10:37:14 AM EST

+17176291559

Call me then so I can jump off calls. Matt (legal) and I are dealign with CDS right now

12/3/24 10:37:21 AM EST

ok.

12/3/24 10:43:58 AM EST

We are days away from losing our cannabis business

12/3/24 10:45:04 AM EST

Our armored carrier stopped carrying for payment. The only business we have left is loader business which is probably on \$100 to \$200k GP per month

12/3/24 10:46:40 AM EST

And we are not paying these customers so I think Paramount is maybe a \$250k GP company after all of this.

12/3/24 10:48:39 AM EST

Maybe Maz comes over to run it ?

12/3/24 11:02:32 AM EST

\$	950,000	GP after sale of Cypress and Phonco	
\$	430,000	GP Cash Connect Locations	
\$	125,000	Doug Michola GP -- cannabis	
\$	100,000	Misc. Cutomer attrition due to non payment	
\$	295,000	Projected average monthly GP 2025	

12/3/24 11:04:52 AM EST (Edited 12/3/24 11:05:01 AM EST)

so bring in Maz and let him run Margo and Paramount. when I'm healthy again we can figure you where you want/need me.

Edited



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+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

12/3/24 11:06:56 AM EST

also I don't know what the impact of moving the investor machines out is on this as well. maybe much less GP than this.

12/3/24 11:16:55 AM EST

\$ 950,000	2025 GP forecast after sale of Cypress and Phonco (8% transaction loss)								
\$ 430,000	GP Cash Connect Locations								
\$ 125,000	Doug Michola GP -- cannabis								
\$ 80,000	ATM Group Terminals not transacting with us								
\$ 100,000	Misc. Customer attrition due to non payment								
\$ 215,000	Projected average monthly GP 2025								
	Investor turnover impact?								

12/3/24 11:17:07 AM EST

updated. missed ATM Group

12/3/24 11:17:52 AM EST

+17176291559

From Rory. Do you k ow anything about this account and why they would be reaching out?

Separately, we got an email from Red River Bank (says it has agreements with Sharenet for 7 ATM locations in Louisiana). Can you give us some background? They are requesting a call

12/3/24 11:19:28 AM EST

+17176291559

➔ Replying to you, 2024-12-03 11:06:56: « also I don't know what the impact of moving the investor machines out is on this as well. maybe much... »

I will deal with this. And keep you out of it. I think we need to force them to go to the service providers and get the things back up.

12/3/24 11:20:07 AM EST

➔ 2024-12-03 11:17:52: « From Rory. Do you k ow anything about this account and why they would be reaching out?

Separately, we got an email fro... »

this is likely one of our customers who is out of cash as a result of the cash connect change. We have a bunch of banks in the same position.

12/3/24 11:20:12 AM EST

➔ 2024-12-03 11:17:52: « From Rory. Do you know anything about this account and why they would be reaching out?

Separately, we got an email fro... »

no solution

12/3/24 11:20:12 AM EST

+17176291559

What is our last GP report with everything online? August or sept. Done have both of those months?

12/3/24 11:21:59 AM EST

2024							
Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24
\$ 1,058,430	\$ 1,274,478	\$ 1,521,272	\$ 1,385,374	\$ 1,477,370	\$ 1,340,805	\$ 1,374,811	\$ 1,490,613
2,986,827	3,157,894	3,484,477	3,210,727	3,382,034	3,236,045	3,218,101	3,343,868
4,526,993	4,742,355	5,199,237	4,863,260	5,130,622	4,894,353	4,917,738	5,070,002
16,646	16,473	16,400	16,440	16,845	16,893	16,940	16,895
272	288	317	296	305	290	290	300

12/3/24 11:29:48 AM EST

August is our most recent month. \$1,490,000. This is usually a seasonally stronger month

12/3/24 12:06:28 PM EST

we are losing terminals at an alarming rate right now.

12/3/24 12:06:48 PM EST

steve just said we are losing about 5% per day on the terminals

12/3/24 12:12:29 PM EST

can we meet in person tonight at 4?

12/3/24 12:15:33 PM EST

Philadelphia Inquirer is doing a story on us about ATMs that are down

12/3/24 12:15:39 PM EST

see email

12/3/24 12:17:11 PM EST

you have to get investor representative to talk to Clatworthy today

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

12/3/24 12:17:50 PM EST

+17176291559

See email I'm sending for the 2 PM meeting. Maybe you wanna just put this out in advance

12/3/24 12:19:00 PM EST

are you going to be on the call? If not I will reschedule to tomorrow.

12/3/24 12:21:11 PM EST

+17176291559

See my email. What are your thoughts? Do we put this out and let them know we're going to reschedule when we have full clarity but this gives them a thorough update. You can add whatever you want to it.

12/3/24 12:28:15 PM EST

I think we put this out from you to the company. We reschedule the company meeting to tomorrow

12/3/24 12:29:13 PM EST

+17176291559

We may not know the outcome by tomorrow.

Can you get bit frantically accurate and put something about a follow-up

12/3/24 12:29:26 PM EST

?

12/3/24 12:32:18 PM EST

+17176291559

Grammatically accurate

12/3/24 12:32:29 PM EST

+17176291559

And put something about scheduling a follow up as soon as we know clear.

12/3/24 12:32:37 PM EST

ok.

12/3/24 12:38:59 PM EST

Clarity of both of these options should occur within the next 48-72 hours. We will reschedule our company meeting when we have a final plan in place which we expect to be later this week.

12/3/24 12:39:08 PM EST

ok?

12/3/24 12:41:23 PM EST

+17176291559

Yes

12/3/24 1:13:21 PM EST

ATM Up is also hitting me for payment and doesn't want to shut us down

12/3/24 1:13:52 PM EST

word is on the street that lawyers are getting people who we owe money to force us into bankruptcy

12/3/24 1:14:09 PM EST

Sal said a lawyer reached out to him yesterday

12/3/24 1:24:26 PM EST

can we meet tonight in person?

12/3/24 1:39:13 PM EST

+17176291559

Why would they be trying to do that?

12/3/24 1:39:17 PM EST

+17176291559

They dont want investors to take over?

12/3/24 1:39:39 PM EST

I think it's an opportunistic lawyer firm

12/3/24 1:39:59 PM EST

Sal also told me that he heard about the investor class action lawsuit

12/3/24 1:40:13 PM EST

+17176291559

So just one lawyer? I thought you meant multiple

12/3/24 1:40:25 PM EST

i can find out

12/3/24 1:40:31 PM EST

he said they just called him yesterday.

12/3/24 1:40:51 PM EST

a lawyer trying to get a bunch of creditors together to liquidate paramount.

12/3/24 1:41:13 PM EST

+17176291559

I think class action is against the fund managers. Did they provide any detail?

12/3/24 1:41:26 PM EST

no.

12/3/24 1:41:28 PM EST

I didn't ask

12/3/24 1:46:15 PM EST

i just pinged him and asked for more information

12/3/24 1:46:34 PM EST

+17176291559

I'm just on calls nonstop. Randall will be into the evening. I think I could meet late tomorrow afternoon if you prefer that vs a phone call tonight.

12/3/24 1:46:57 PM EST

i will make anything work.

12/3/24 1:59:42 PM EST

all I can say is you better get things closed fast. I have a vendor who reached out to me about the \$138M judgment and are planning to shut us down

12/3/24 1:59:50 PM EST

An IT vendor

12/3/24 1:59:58 PM EST

I think the sharks are circling

12/3/24 2:31:20 PM EST

sorry to do this to you but any chance I can get some payment for my stock this week? Would really help my headspace to know that I'm out of debt and could live on my wife's salary for awhile.

12/3/24 2:32:58 PM EST

also, finance people are gathering up their personal effects.

12/3/24 2:36:27 PM EST

➔ Replying to you, 2024-12-03 08:37:14: « Powell wants to purchase First Regents from us. He wants to forgo his ripcord option which pays 9 mult... »

Does First Regents transfer to the investors or is this separate?

12/3/24 2:36:48 PM EST

Powell thinks this is separate and wants to buy it

12/3/24 2:36:49 PM EST

now

12/3/24 2:37:13 PM EST

need your blessing or ot.

12/3/24 2:37:15 PM EST

not

12/3/24 2:37:25 PM EST

+17176291559

I need to research. I feared doing something wrong. Let him know and do everything possible to get it to him.

12/3/24 2:56:04 PM EST

Liked "I need to research. I feared doing something wron..."

12/3/24 2:58:40 PM EST

what is the status of monthly GP share payments and/or buyouts with acquisition partners if we move all terminals to investors?

12/3/24 3:11:27 PM EST

Daryl — contempt filing by investors in court

12/3/24 3:11:38 PM EST

+17176291559

wtf!

12/3/24 3:11:57 PM EST

+17176291559

Send to me

12/3/24 3:12:20 PM EST

in your inbox

12/3/24 3:18:42 PM EST

what do they want that we did not provide?

12/3/24 3:18:49 PM EST

other than location agreements?

12/3/24 3:18:57 PM EST

should we be pulling these together as well?

12/3/24 3:19:02 PM EST

+17176291559

The odd thing is Rory is not even copied. I'm trying to get information.

12/3/24 3:19:17 PM EST

ok.

12/3/24 3:19:20 PM EST

+17176291559

There can be no litigation, but maybe jeff should smack this down. He may not engage anymore, but I'll send him an email. Matt and Richard are dealing with it.

12/3/24 3:19:30 PM EST

ok.

12/3/24 3:20:20 PM EST

are you sending docs to them?

12/3/24 3:20:38 PM EST

+17176291559

They've been in portal since last night. Everything you sent today went in portal.

12/3/24 3:20:46 PM EST

ok.

12/3/24 3:20:59 PM EST

i think they only thing they need yet is location agreements

12/3/24 3:30:35 PM EST

Should we be gathering the location agreements?

12/3/24 3:30:42 PM EST

+17176291559

Yes

12/3/24 3:31:12 PM EST

Ok. I guess all customers?

12/3/24 3:36:06 PM EST

+17176291559

Whatever you can find



12/3/24 3:39:09 PM EST

ok. I think we have a ton of them. Do you have a dropbox link we can send them to?

12/3/24 3:43:26 PM EST

Rindner is getting an attorney, says we sold the ATMs to investors and he should have been paid at that time in his equity participation business.

12/3/24 3:43:47 PM EST

or third financial event.

12/3/24 3:51:02 PM EST

+17176291559

That's ridiculous. They're sold at the time of his acquisition not after.

12/3/24 4:05:23 PM EST

do you have a drop box link for us for location agreements?

12/3/24 4:16:30 PM EST

i told hannah to hold off on the office move.

12/3/24 4:23:35 PM EST

➔ Replying to you, 2024-12-03 16:05:23: « do you have a drop box link for us for location agreements? »

I need this asap

12/3/24 4:24:30 PM EST

+17176291559

Yes. Who should I give access to?

12/3/24 4:24:42 PM EST

Leigh Danca

12/3/24 4:28:56 PM EST

+17176291559

Do we trust her? That's all that's going on with Sharenet. Is she the only people that can pull down the agreements?

12/3/24 4:29:02 PM EST

+17176291559

Should we do a separate portal?

12/3/24 4:29:20 PM EST

i can have her create one for us and give outside access.

12/3/24 4:29:26 PM EST

through teams

12/3/24 4:30:16 PM EST

+17176291559

To stay consistent in dropbox I'll have Aaron make one and send to her.

12/3/24 4:30:23 PM EST

ok.

12/3/24 4:30:27 PM EST

that's fine.

12/3/24 4:31:05 PM EST

anything on CDS releasing our cash?

12/3/24 4:33:41 PM EST

so who is running investor ATM company ?

12/3/24 4:33:48 PM EST

Jorge? Maya?

12/3/24 4:34:00 PM EST

Jeffery Keith?

12/3/24 4:34:46 PM EST

+17176291559

Don't know. Just asked. I don't think Maya has anything to do with it.

12/3/24 4:34:52 PM EST

+17176291559

It will not be for a week or two if at all

12/3/24 4:35:07 PM EST

+17176291559

➔ Replying to you, 2024-12-03 16:31:05: « anything on CDS releasing our cash? »

Still working it

12/3/24 4:35:59 PM EST (Edited 12/3/24 4:36:11 PM EST)

is there really a chance that this will get funded? It seems like a long shot to me based on everything that's happening

Edited

12/3/24 4:36:17 PM EST

+17176291559

Increasingly, a long shot, agreed

12/3/24 4:36:21 PM EST

ok

12/3/24 4:36:42 PM EST

how are we handling aging payables?

12/3/24 4:37:08 PM EST

we have numerous vendors shut down

12/3/24 4:45:56 PM EST

<https://apple.news/Ax56VGXpeTOamWRgcmF99TA>

12/3/24 5:12:15 PM EST

Need cash to pay off what paramount charged to my credit card

12/3/24 5:12:23 PM EST

+17176291559

Sent to Leigh

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

12/3/24 5:12:31 PM EST

Please

12/3/24 5:12:34 PM EST

\$110k

12/3/24 5:12:37 PM EST

+17176291559

Dropbox link

12/3/24 5:12:50 PM EST

+17176291559

➔ Replying to you, 2024-12-03 17:12:15: « Need cash to pay off what paramount charged to my credit card »

We will get all this cleared up

12/3/24 5:13:01 PM EST

+17176291559

I'm waiting for some funds to come in into me personally

12/3/24 5:13:17 PM EST

Ok. Thanks.

12/3/24 5:16:24 PM EST

+17176291559

Are these agreements coming from a database that I can access and look at. I'd be happy to move them over late at night so I can review in the interim.

12/3/24 5:16:39 PM EST

+17176291559

Are they on a central repository that leigh could give me access to?

12/3/24 5:16:58 PM EST (Edited 12/3/24 5:17:13 PM EST)

If we could download all of the agreements, then she could do that very quickly but because phonco and Cypress are intermixed, she has to go through one at a time she's gonna get a couple hundred downloaded tonight

Edited

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

12/3/24 5:17:57 PM EST

+17176291559

Can she give me access to the portal? I may need some of a phone call anyway if they are integrated. I need to work through that myself with John if there is any.

12/3/24 5:18:11 PM EST

+17176291559

If they're all in or sensor repository, I prefer just to have access to it

12/3/24 5:18:25 PM EST

+17176291559

Central repository I prefer

12/3/24 5:18:52 PM EST

Oh no. You will have a lawsuit from John on your hands so quick

12/3/24 5:19:08 PM EST

+17176291559

Don't know if there is

12/3/24 5:19:27 PM EST

There is no portal. This is a program that she has to use to select and download to your

12/3/24 5:19:36 PM EST

Dropbox file

12/3/24 5:19:37 PM EST

+17176291559

I really fear they will see this as risk for Sharenet and her dad.

12/3/24 5:19:40 PM EST

+17176291559

Okay.

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

12/3/24 5:19:51 PM EST

+17176291559

Did we ever send all the agreements to David Charles as he messaged me last week as well?

12/3/24 5:19:58 PM EST

I believe so

12/3/24 5:20:29 PM EST

+17176291559

Maybe I'll get her to break it into three sub folders

12/3/24 5:20:43 PM EST

Ok.

12/3/24 5:20:59 PM EST

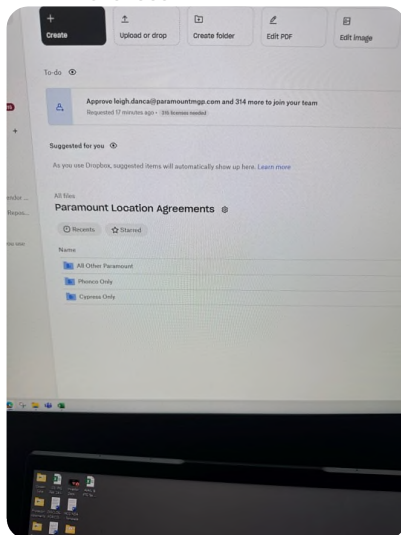
The issue is it'll just be one big dump of contracts and we cannot have phone code in there or Cyprus

12/3/24 6:17:45 PM EST

Are you seeing contracts from Leigh?

12/3/24 6:21:56 PM EST

+17176291559



Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

12/3/24 6:22:03 PM EST

+17176291559

She has structure set up. It hasn't loaded any yet. I'm sure she will tonight.

12/3/24 6:23:01 PM EST

Ok.

12/3/24 6:24:54 PM EST

She said there is a bunch in there and still loading more.

12/3/24 6:32:31 PM EST

Are you seeing them?

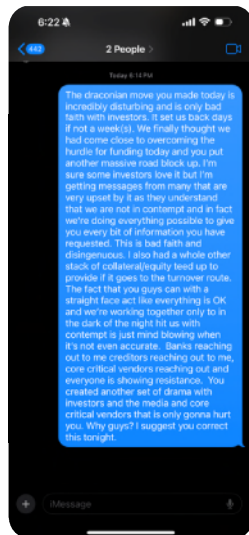
12/3/24 6:33:20 PM EST

+17176291559

Just to keep you in the loop. But these guys did is completely disingenuous and a complete lie as we are not in contempt. This was sent to Billy and Jerry by me. They've been communicating with me. The last two days acting like everything is great.

12/3/24 6:33:32 PM EST

+17176291559



Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

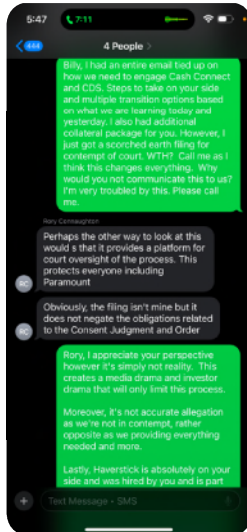
12/3/24 6:34:25 PM EST

+17176291559

This is with Rory, Billy, and my two attorneys. This was a Complete BS and bully move and bad faith. We have provided them everything they need. They know we still want to do buyout and needed to resolve Cash Connect and CDS which we made huge progress today were about to present plan to them only to get this emailed to us. You can see Rory acts like he has nothing to do with it initially and then owns it when I call him as Rory/Fund Managers are directing all the shots.

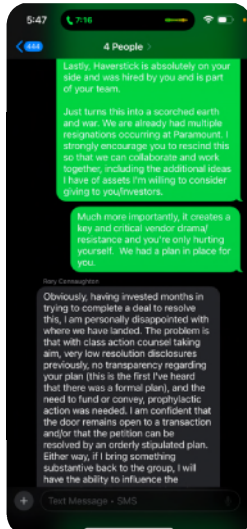
12/3/24 6:34:39 PM EST

+17176291559



12/3/24 6:34:39 PM EST

+17176291559



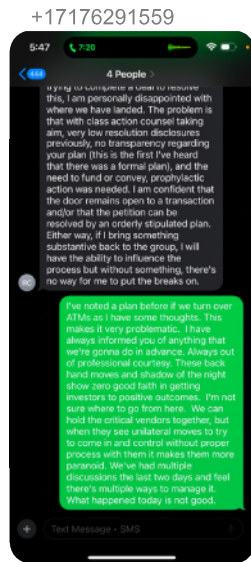


Messages - +17176291559

Certification in Support Page 741 of 810

+17178242965, randall.leaman@gmail.com, dleaman@ptd.  
net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

12/3/24 6:34:39 PM EST



12/3/24 6:36:08 PM EST

Thanks.

12/3/24 6:37:16 PM EST

Are you seeing contracts from Leigh now?

12/3/24 6:38:04 PM EST

Any response from Torosian?

12/3/24 6:38:19 PM EST

+17176291559

Yes, starting to see

12/3/24 6:38:37 PM EST

Liked "Yes, starting to see"

12/3/24 6:47:50 PM EST

You just need to hand everything over to them and walk away from this.

12/3/24 6:54:18 PM EST

Moving forward, just follow the rules that are established by the court and the deadlines and don't let them lead you into believing everything's OK

12/3/24 7:21:51 PM EST

Did you find out if Mike Powell's ATMs are free of investor liens?

12/3/24 8:08:09 PM EST

you should be able to see most if not all agreements in there.

12/3/24 8:08:18 PM EST

in the folders

12/3/24 8:08:45 PM EST

what else do we need to provide to satisfy the judgement?

12/3/24 8:15:47 PM EST

so if we now provided everything that they requested, there is no need for a hearing?

12/3/24 8:37:25 PM EST



### Warning: Your Dropbox is full

You've reached the space limit on your current plan. In order to finish uploading `EI_Rey_De_Wyckoff_Food_Corp_dba_Chesperito_-_Executed_Contract.pdf`, you need to add more storage to your dropbox.

[View your options](#)

12/3/24 8:37:25 PM EST

I can't upload any more

12/3/24 8:37:29 PM EST

From Leigh

12/3/24 8:38:29 PM EST

What do you want to do?

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

12/3/24 8:39:45 PM EST

LNP | LancasterOnline: Investors in Lancaster-based ATM network seek contempt hearing to enforce \$138M judgement, transfer of cash machines

12/3/24 8:39:46 PM EST

[https://lancasteronline.com/business/local\\_business/investors-in-lancaster-based-atm-network-seek-contempt-hearing-to-enforce-138m-judgement-transfer-of/article\\_6d5c6290-b1be-11ef-a323-4b10a3115873.html](https://lancasteronline.com/business/local_business/investors-in-lancaster-based-atm-network-seek-contempt-hearing-to-enforce-138m-judgement-transfer-of/article_6d5c6290-b1be-11ef-a323-4b10a3115873.html)

12/3/24 8:39:46 PM EST

Investors in Lancaster-based ATM network seek contempt hearing to enforce \$138M judgement, transfer of cash machines

12/3/24 8:43:16 PM EST

+17176291559

Yeah that's not right, we have 20TB plan and only have used 1% of that

12/3/24 8:43:31 PM EST

Hmmm

12/3/24 8:43:44 PM EST

+17176291559

We are looking at it

12/3/24 8:48:14 PM EST

+17176291559

Can she try again

12/3/24 8:48:31 PM EST

I will let her know

12/3/24 8:56:47 PM EST

Still not working

12/3/24 8:56:55 PM EST

From Leigh

No I think it's because I am not in their account, so my account is maxed out

12/3/24 9:27:01 PM EST

+17176291559

She can free up some of her space by permanently deleting items in her trash/deleted folder as a quick fix.

We don't have anymore licenses to give out so we would have to buy one for her

12/3/24 9:27:13 PM EST

+17176291559

We could potentially add her to our account for a couple hundred dollars if we need to do that. Can you start a group text and add Aaron Fogleman to the group text?

12/3/24 9:28:11 PM EST

+17176291559

We could actually just buy her a new license under us which will resolve it. I think they're doing that now.

12/3/24 10:07:25 PM EST

Anything else you need from us to fulfill the terms of the judgement?

12/3/24 10:08:05 PM EST

+17176291559

Nope

12/3/24 10:08:23 PM EST

Liked "Nope "

12/3/24 10:16:28 PM EST

Any date when the investors take over?

12/3/24 10:16:44 PM EST

And did you say that I have a job at heller cap?

12/3/24 10:42:19 PM EST

+17176291559

Yes. Rebranded.

12/3/24 10:42:26 PM EST

+17176291559

➔ Replying to you, 2024-12-03 22:16:28: « Any date when the investors take over? »

Don't know

12/3/24 10:42:36 PM EST

Loved "Yes. Rebranded. "

12/3/24 11:12:30 PM EST

Also job for my son Evan ? Not sure what new entity is going to need

12/3/24 11:15:09 PM EST

+17176291559

For sure

12/3/24 11:20:10 PM EST

Loved "For sure "

12/3/24 11:20:42 PM EST

Torosian is not going to represent. Just sent email

12/3/24 11:40:11 PM EST

+17176291559

I did not think he would.

12/3/24 11:40:20 PM EST

Liked "I did not think he would. "

12/4/24 7:07:43 AM EST

We need to find out now who is taking over ATMs for investors. They now are in control of them and I can't make any more decisions on them.

12/4/24 7:10:25 AM EST

Per Sasha

12/4/24 7:10:29 AM EST

Hi Randall. So, per your request, I reviewed both this Agreement and the Cash Provisioning Agreement. However, in light of what I saw in the news today, and what's going on with the lawsuits, I do not know whether Paramount has the authority to enter into any of these agreements, and doing so may subject you to more liability. I have no knowledge, other than what's in the news, as to what's actually going on with Heller or Paramount, or what's allowed or prohibited per the court orders, etc. but I believe that entering into this type agreement in the middle of all of this, would not be a good idea. I recommend that you discuss these agreements with the attorney handling the disputes before signing them and committing to anything or committing the ATMs to these transactions.

12/4/24 7:23:03 AM EST

Should I start forwarding emails to Jerry?

12/4/24 7:23:24 AM EST

And acquisition partners?

12/4/24 7:24:47 AM EST

And any customers?

12/4/24 7:25:24 AM EST

+17176291559

Definitely not yet. We're trying to get direction today.

12/4/24 7:25:42 AM EST

+17176291559

What agreement did Sasha review on? What was she responding on?

12/4/24 7:26:05 AM EST

The agreement with Saba and ATMs of America

12/4/24 7:26:17 AM EST

I just don't want to create a liability by making any decision decisions on these machines so I am going to stop responding

12/4/24 7:27:11 AM EST

I'm operating under the assumption that effective last night everything was turned over to them and they are now in control

12/4/24 7:28:29 AM EST

So our people need a contact person

12/4/24 7:30:50 AM EST

So I need to notify everyone today who is taking this and making decisions.

12/4/24 7:34:17 AM EST

+17176291559

They do not feel they're in control of them. Let me get legal positions.

12/4/24 7:34:56 AM EST

Well, we gave them everything they requested on the judgment. I think that means they're in charge?

12/4/24 7:36:18 AM EST

Given the legal nature of this fight, I don't want to be opening myself up to any liability so unless they're legal and our legal agree that Steve and I have authority to continue managing and tell me that in writing, I won't be doing anything.

12/4/24 7:36:59 AM EST

They should've had somebody in place ready to go taking this information and reaching out to vendors so something should've been happening behind the scenes Prior to this so that they're ready to direct

12/4/24 7:38:20 AM EST

+17176291559

We spoke to them last night. I will send you transition plan concepts that I was gonna put to yesterday until we got the contempt. They're also suggesting they may remove the contempt because they have every thing we can provide. They cannot operate any machines until they would be approved by all the vendors. Let me get your email after I speak to.

12/4/24 7:39:32 AM EST

ok.

12/4/24 7:44:37 AM EST

Also, I'm inundated with customer, vendor and acquisition partner payment requests. What am I supposed to tell them?

12/4/24 7:45:32 AM EST

don't know if you saw this but you are soon going to get a personal judgment against you

12/4/24 7:45:34 AM EST

Daryl and Randall, a few items requiring urgent attention, please:

1 Because we have not received verified discovery responses signed by Daryl to provide to opposing counsel, Cypress Advantage's counsel has asked the mediator to award sanctions against Paramount. The mediator has scheduled a telephone conference at 9am on Thursday, December 5th. If we have not served verified responses by then, the mediator could award sanctions against Paramount and Daryl, personally, including deeming that Daryl has admitted certain allegations or other sanctions that might have adverse consequences on the defense of Cypress's claims. I have attached the draft responses here again. They were previously sent to you on November 18th and 25th.

2 Attached also is the invoice for the arbitration fees of \$8,250.00. Please put this in line for payment as soon as possible.

3 Attached is an invoice from our local counsel in New York in the Sharenet dispute. I would appreciate if you could put this in line for payment, as well.

Thank you,

Devin

12/4/24 7:46:03 AM EST

Paramount too

12/4/24 7:59:17 AM EST

I think the quickest conversion is to have them put someone in my role now and we will direct everyone to that person.

12/4/24 8:03:19 AM EST

Do they know they're about to lose all the cannabis business?

12/4/24 8:03:24 AM EST (Edited 12/4/24 8:03:31 AM EST)

They need to get on this ASAP

Edited



Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.  
net, +17179175670, randall.leman@paramountmgp.com, +17179172753

12/4/24 8:12:37 AM EST

➔ Replying to you, 2024-12-04 07:44:37: « Also, I'm inundated with customer, vendor and acquisition partner payment requests. What am I suppos... »

thoughts? I don't want to be telling people that we are going to pay them (as I have been doing) if that's not the case

12/4/24 8:13:48 AM EST

just received notice of termination from PA Turnpike. you probably want to let investor rep know.

12/4/24 8:14:15 AM EST

+17176291559

I have messages out right now

12/4/24 8:15:44 AM EST

OK, they're gonna need to remove the machines before January 3 so you will need to let them know that

12/4/24 8:16:02 AM EST

Or on January 3

12/4/24 8:16:13 AM EST

+17176291559

Send to me

12/4/24 8:16:33 AM EST

in your inbox

12/4/24 8:47:09 AM EST (Edited 12/4/24 8:47:24 AM EST)

just spoke to PA Turnpike — they said that if we cure the issue, they can rescind the termination notice. but we will also need to get approval for reassignment of our agreement.

Edited

12/4/24 8:47:36 AM EST

+17176291559

What do we need to cure?

12/4/24 8:47:43 AM EST

cash in the ATMs

12/4/24 8:47:48 AM EST

so they are operational.

12/4/24 8:47:56 AM EST

and probably paying them their monthly share

12/4/24 8:48:43 AM EST

again, we are losing business daily and significant amounts. So the sooner they take over the better

12/4/24 8:56:52 AM EST

+17176291559

Is SMSATA our software platform?

12/4/24 8:57:17 AM EST

Yes

12/4/24 8:57:33 AM EST

+17176291559

Do others use that as well or is it proprietary to us?

12/4/24 8:57:33 AM EST

For monitoring and dispatch

12/4/24 8:58:03 AM EST

Proprietary. We got from SHARENET and invested in it to make it a great program.

12/4/24 8:58:33 AM EST

We've been modifying it since the day we bought it and it works really well. It's super program.

12/4/24 8:58:54 AM EST

+17176291559

Somehow, they knew that name. Maybe it's coming through Leigh?

We are no responsibility to turnover any software nor does legal think we should. We just need to let them take it into their own platforms to stay clean.

12/4/24 8:59:20 AM EST

Brings in alerts from the ATMs figures out which ones are real which ones aren't creates tickets sends tickets to service techs, service tax do their work report back we can close out tickets monitor up time

12/4/24 9:00:02 AM EST

➔ 2024-12-04 08:58:54: « Somehow, they knew that name. Maybe it's coming through Leigh?

We are no responsibility to turnover any software no... »

ok. the information regarding this known to anyone who has ever worked here.

12/4/24 9:00:25 AM EST

➔ 2024-12-04 08:58:54: « Somehow, they knew that name. Maybe it's coming through Leigh?

We are no responsibility to turnover any software no... »

so it could be jorge, maya, any previous customer service rep etc.

12/4/24 9:00:58 AM EST

this is the software that Ray Davis was trying to take back in his repossession attempts

12/4/24 9:02:03 AM EST

plus this software is a database, stores all of the information regarding contracts, customer contact information etc. That's how Leigh was able to grab all of those contracts so quickly.

12/4/24 9:02:09 AM EST

she is the master mind behind this.

12/4/24 9:03:25 AM EST

this is such a robust program that we could probably create a company to do nothing but monitor machines, manage parts, dispatch service, etc as an agnostic machine manager for any ATM company, bitcoin machine, kiosk, vending machine, etc.

12/4/24 9:04:34 AM EST

we have a kick ass team of people in Jackson MS that do this.

12/4/24 9:05:25 AM EST

regarding PA Turnpike, we had found loaders to load some or all of the machines. I don't feel comfortable making a decision here.

12/4/24 9:05:33 AM EST

should we continue or put a hold on it.

12/4/24 9:06:31 AM EST

+17176291559

➔ Replying to you, 2024-12-04 09:03:25: « this is such a robust program that we could probably create a company to do nothing but monitor machin... »

We should use for PowerCoin

12/4/24 9:06:39 AM EST

yes!

12/4/24 9:07:22 AM EST

that's why it made NO sense when Austin decided t scrap it and create his own

12/4/24 9:07:31 AM EST

+17176291559

➔ Replying to you, 2024-12-04 09:05:25: « regarding PA Turnpike, we had found loaders to load some or all of the machines. I don't feel comfor... »

Can you send me email on this so I can forward. I will not forward your email. I will send it from me, but I need to know what I need to get approval on. Also attach the letter from PA Turnpike Commission.

12/4/24 9:13:28 AM EST

Sent

12/4/24 9:39:13 AM EST

notice of hearing in your email.

12/4/24 9:39:37 AM EST

December 6 at 3 pm

12/4/24 9:47:34 AM EST

Barry Sears on his way to load PA Turnpike Sites. I'm having him continue unless you tell me otherwise.

12/4/24 9:47:47 AM EST

+17176291559

Please continue

12/4/24 9:47:51 AM EST

+17176291559

Who is providing the cash?

12/4/24 9:48:00 AM EST

I think Barry is

12/4/24 9:48:05 AM EST

personal cash

12/4/24 9:48:19 AM EST

+17176291559

Wouldn't it take a couple hundred thousand?

12/4/24 9:48:35 AM EST

I don't know. I will find out.

12/4/24 9:49:03 AM EST

+17176291559

Just surprised he has that much money

12/4/24 9:49:38 AM EST

yeah, he might be only loading a few.

12/4/24 9:50:22 AM EST

no word from investors on who is taking over?

12/4/24 9:51:19 AM EST

he is just putting on locks. they have other loaders to load

12/4/24 9:55:41 AM EST

➔ Replying to you, 2024-12-04 07:44:37: « Also, I'm inundated with customer, vendor and acquisition partner payment requests. What am I suppos... »

I need to know what to say here please. I feel like shit asking people to work for us and thinking we won't pay them

12/4/24 10:11:01 AM EST

+17176291559

Hang tight. I don't wanna do anything or legal doesn't approve us doing.

12/4/24 10:38:46 AM EST

Ok.

12/4/24 10:40:22 AM EST

Also worried about the number of ATMs and the investor expectation of performance if we turn these over to them. We don't have 28,000 units which I saw on the serial number list. Is all hell going to break loose ?

12/4/24 10:54:05 AM EST

we were at almost 17,000 active terminals in August before selling Cypress and Phonco

12/4/24 10:54:46 AM EST

my guess is that we are at less than 10,000 after that and down much more after the CashConnect fiasco.

12/4/24 10:54:54 AM EST

+17176291559

I hope not. This included all Bos and many of this termed out already

12/4/24 10:55:22 AM EST

+17176291559

We are managing against that concern

12/4/24 10:55:58 AM EST

any idea how many termed out?

12/4/24 10:57:19 AM EST

and how can you manage against that? doesn't seem like something that can be managed

12/4/24 11:02:14 AM EST

Daryl?

12/4/24 11:05:12 AM EST

I'm seriously tripping here.

12/4/24 11:12:55 AM EST

This is appearing to be fraudulent to me. Please tell me why my perception is incorrect.

12/4/24 11:14:02 AM EST

+17176291559

I am with them right now. Sorry not ignoring. Not fraudulent. We needed to assign ATMs which we did, not have all operating. Never a requirement.

12/4/24 11:14:13 AM EST

+17176291559

We will probably put another document to them with term out removals

12/4/24 11:14:17 AM EST

+17176291559

As well

12/4/24 11:15:13 AM EST

OK, any idea how many that nets out to be?

12/4/24 11:16:13 AM EST

+17176291559

Probably low 20s or high teens

12/4/24 11:16:59 AM EST

So how do we reconcile that with the current number? Or are you saying that's how many will be coming out of the list of 28k?

12/4/24 11:18:06 AM EST

We can't be double dipping on the Cypress and Phonco locations.

12/4/24 12:43:34 PM EST

just so you are aware, we have about 13,000 ATMs — 8,728 active terminals with customers, 1,223 in warehouses, 1,500 Tridata and 1,465 investor ATMs that we disposed of this summer when we thought investor program was over.

12/4/24 12:56:44 PM EST

are we meeting in person today?

12/4/24 12:56:50 PM EST

if so what time?

12/4/24 1:19:44 PM EST

I've asked Rose to add your signature to the Cypress discovery. The hearing is tomorrow morning and we cannot have our attorney in a meeting where you didn't provide discovery. it would be very bad for you

12/4/24 1:20:04 PM EST

please acknowledge you see this.

12/4/24 1:20:12 PM EST

+17176291559

Sorry just seeing this. I'm still with.

12/4/24 1:20:28 PM EST

+17176291559

That is fine on Cypress. I'll get to look at it shortly.



Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

12/4/24 1:20:40 PM EST

it's rather innocuous

12/4/24 1:20:51 PM EST

+17176291559

➔ Replying to you, 2024-12-04 11:16:59: « So how do we reconcile that with the current number? Or are you saying that's how many will be comin... »

No, the ATMs do not have to be operational. We have them in warehouses in Georgia and Kentucky.

12/4/24 1:21:23 PM EST

ok. I wasn't aware of that

12/4/24 1:21:37 PM EST

so how many are they expecting to get when we turn this over to them?

12/4/24 1:22:22 PM EST

I can account for about 13,000.

12/4/24 1:29:07 PM EST

what is status of investor take over ? Anyone I can direct people to?

12/4/24 2:30:15 PM EST

also, both comms providers are going to shut us down. This means that ALL ATMs will stop operating. We owe the one \$100k and the other \$69k. This will occur as early as tomorrow. We can make some progress payments but they are that might be half that amount but they are tired of us paying late.

12/4/24 2:34:12 PM EST

+17176291559

Ask them if we can make a partial payment to keep them mopped for another week or so until we are fully funded. 30% of invoice

12/4/24 2:34:46 PM EST

anything on conversion? On with Steve now and we are unable to do anything but watch machines go down

12/4/24 2:35:13 PM EST

terribly frustrating.

12/4/24 2:36:15 PM EST

+17176291559

Machines are going down because of no cash you mean?

12/4/24 2:36:22 PM EST

yes.

12/4/24 2:36:26 PM EST

and no customer payments

12/4/24 2:36:29 PM EST

over 90 day

12/4/24 2:36:47 PM EST

+17176291559

CVS holding our cash for a week is killing us as well. It's got to be close to a half million by now.

12/4/24 2:38:40 PM EST

yes.

12/4/24 2:40:09 PM EST

what about investor plan for conversion? anything?

12/4/24 2:41:17 PM EST

+17176291559

We are going back-and-forth

12/4/24 2:43:19 PM EST

we are sitting dead in the water here.

12/4/24 2:43:52 PM EST

➔ 2024-12-04 14:34:12: « Ask them if we can make a partial payment to keep them mopped for another week or so until we are fully funded. 30% of ... »

can we commit to payment?

12/4/24 2:44:19 PM EST

if so, by when? we will need cash from you

12/4/24 2:44:31 PM EST

+17176291559

Yes, if they keep it up for another week. Offer one of them 15 K and the other 20 K.

12/4/24 2:44:44 PM EST

+17176291559

And then another equal payment next week at the same time

12/4/24 2:45:36 PM EST

ok. problem is we already offered weekly payment plan but haven't stayed with it.

12/4/24 2:46:14 PM EST

also just a reminder that Mid Florida has shut us down. They are the armored carrier for Doug's dispensaries.

12/4/24 2:46:24 PM EST

these machines will run out fast

12/4/24 2:46:28 PM EST

+17176291559

Is there anything else needed on Cyprus?

12/4/24 2:46:36 PM EST

+17176291559

➔ Replying to you, 2024-12-04 14:46:14: « also just a reminder that Mid Florida has shut us down. They are the armored carrier for Doug's disp... »

Would 10 or 15 K get us back up for a few days?

12/4/24 2:47:27 PM EST

they are demanding \$136k payment. They are done with us paying late.

12/4/24 2:48:41 PM EST

we have been delaying payment to them for several months and they are not going to accept partial payment

12/4/24 2:49:34 PM EST

+17176291559

Is everything done with Cypress or do I need to do something?

12/4/24 2:49:48 PM EST

yes. all done.

12/4/24 2:50:36 PM EST

+17176291559

So it prevents a judgement?

12/4/24 2:51:46 PM EST

sort of. There was a hearing scheduled tomorrow. had you not responded, the arbiter would have punished you by giving them what they want immediately. So we effectively delayed the inevitable.

12/4/24 2:54:24 PM EST

oldest aging for both comms providers is 36,463.80 + 23,209.07 =59,672.87. Ok to approve?

12/4/24 2:55:51 PM EST

by the way, the rumor is Jeffery Keith and Maya taking over Paramount accounts.

12/4/24 2:55:53 PM EST

per Steve

12/4/24 2:58:17 PM EST

➔ Replying to you, 2024-12-04 14:54:24: « oldest aging for both comms providers is 36,463.80 + 23,209.07 =59,672.87. Ok to approve? »  
approved?

12/4/24 2:58:39 PM EST

for tomorrow

12/4/24 3:00:26 PM EST

I'm hoping they accept this because they too are tired of us with aging payables. They are demanding more.

12/4/24 3:01:07 PM EST

+17176291559

Can we pay it by 12 on Friday not tomorrow?

12/4/24 3:01:20 PM EST

I can propose and see what they say.

12/4/24 3:01:41 PM EST

+17176291559

Please do

12/4/24 3:01:47 PM EST

done.

12/4/24 3:01:54 PM EST

anything on Mid Florida?

12/4/24 3:08:19 PM EST

can we talk at 4? I can meet in person.

12/4/24 3:08:36 PM EST

+17176291559

Randall, I'm in the middle of dealing with his hearing for Friday and the settlement.

12/4/24 3:08:44 PM EST

ok

12/4/24 3:09:58 PM EST

from Josh Voss

12/4/24 3:10:00 PM EST

Paramount Management Group,

Per the Consent Judgment and Order of November 21, 2024, Paramount was obligated to supply "a complete inventory of all ATM Units purchased by Plaintiffs (or members of Plaintiffs)." To date, we have not seen any such list in the document productions. As such, please immediately supply that inventory required by the Consent Judgment.

Regards,

Josh

12/4/24 3:10:49 PM EST

email in your inbox

12/4/24 3:12:31 PM EST

ATM Counts					
12/4/24					
		Aug 24	Dec 24		
	Acquired	Active	Active		
Cypress	6,744	6,792	-		
Phonco	1,478	1,375	-		
All Other	12,041	8,728	8,728		
PMG Warehouses	2,688	1,223	1,223	1,465	Disposed summer of 2024
Tridata	1,500	1,500	1,500		
Total	24,451	19,618	11,451	1,465	12,916

12/4/24 3:12:39 PM EST

here is what I know about

12/4/24 3:14:10 PM EST

+17176291559

No, he's talking bill of sales. Legal is going to respond directly for us to keep us clean.

12/4/24 3:14:20 PM EST

Ahh...

12/4/24 3:14:32 PM EST

+17176291559

We have thousands more in the trade data warehouses

12/4/24 3:14:38 PM EST

+17176291559

I'm pulling down our records

12/4/24 3:15:02 PM EST

Ok. Good to know. Having heart palpitations here 🙄

12/4/24 3:32:24 PM EST

+17176291559

Voss and havesticks are being dicks. I don't think you will need to attend and working with legal to accomplish that.

12/4/24 3:36:06 PM EST

Cool

12/4/24 3:37:31 PM EST

will you have legal counsel ready ?

12/4/24 3:38:06 PM EST

+17176291559

We're working on it

12/4/24 3:38:12 PM EST

+17176291559

Matt and Rory can't because of conflict

12/4/24 3:40:18 PM EST

why don't you just give them what they are asking for an end this?

12/4/24 3:41:19 PM EST

now my name is going to be in the paper.

12/4/24 3:41:23 PM EST

fucking hell

12/4/24 3:42:10 PM EST

if I resign now. can I avoid this ?

Messages - +17176291559

+17178242965, randall.leaman@gmail.com, dleaman@ptd.  
net, +17179175670, randall.leaman@paramountmgp.com, +17179172753

12/4/24 3:43:47 PM EST

what else do they need to see?

12/4/24 3:51:21 PM EST

+17176291559

We have!!

12/4/24 3:51:36 PM EST

+17176291559

Possibly. I'll ask.

12/4/24 3:52:48 PM EST

thanks. I will send you separation agreement. I just copied Dennis'

12/4/24 3:53:16 PM EST

what is your personal email address?

12/4/24 3:56:29 PM EST



PMG - Randall Leaman Separation Agreement.docx

12/4/24 3:58:55 PM EST



Paramount - Assignment of Membership Interests (Randall Leaman).doc

12/4/24 4:04:28 PM EST

payroll being covered next week?

12/4/24 4:04:37 PM EST

employees are asking

12/4/24 4:08:27 PM EST

just need you to sign these docs.



12/4/24 4:09:07 PM EST



First Regents - Assignment of Membership Interests (Randall Leaman).doc

12/4/24 4:09:16 PM EST



PowerQwest - Assignment of Membership Interests (Randall Leaman).doc

12/4/24 4:12:46 PM EST

What does our legal say about this?

12/4/24 4:14:15 PM EST

Do I need to get my own legal? I don't want this to go down to the wire like superior

12/4/24 4:22:54 PM EST

I'm talking to my own legal.

12/4/24 4:25:16 PM EST

I've officially resigned December 1. You accepted this by text.

12/4/24 4:37:36 PM EST

➔ 2024-11-29 08:38:16: « I'm sorry you're in this position randall. I can definitely accept the resignation however we were certainly needed... »

this is what I'm referring to.

12/4/24 4:37:45 PM EST

➔ 2024-11-29 08:38:16: « I'm sorry you're in this position randall. I can definitely accept the resignation however we were certainly needed... »

which was on Friday.

12/4/24 4:37:59 PM EST

+17176291559

I just spoke to Billy. I think they're removing the contempt.

12/4/24 4:38:39 PM EST

who is Billy? our counsel or theirs?

12/4/24 4:39:07 PM EST

I'd still like to get these docs signed. I will continue to help as I've been but want to avoid any future entanglements.

12/4/24 4:39:28 PM EST

you ok with that? I'll get my counsel to modify docs and run by Gierasch

12/4/24 4:40:45 PM EST

also will need to modify our stock purchase agreement so that I'm giving up all of my stock now and you can pay according to the schedule we already have now.

12/4/24 5:00:32 PM EST

+17176291559

I will accept whatever. The asset sales agreement is Heller investment holdings and six other of my entities that is close to 400m. In return equity for each one so it is a premoney valuation and a couple hundred millions gets returned to me.

12/4/24 5:00:49 PM EST

+17176291559

➔ Replying to you, 2024-12-04 16:38:39: « who is Billy? our counsel or theirs? »

will find our shortly but I think they are cancelling hearing

12/4/24 5:01:33 PM EST

+17176291559

➔ Replying to you, 2024-12-04 16:40:45: « also will need to modify our stock purchase agreement so that I'm giving up all of my stock now and ... »

So yes with the deal outlined below I can easily pay you

Messages - +17176291559

+17178242965, randall.leanan@gmail.com, dleanan@ptd.net, +17179175670, randall.leanan@paramountmgp.com, +17179172753

12/4/24 5:02:45 PM EST

Thanks!. What is the timing of the payment to me?

12/4/24 5:03:18 PM EST

+17176291559

Matthew is telling me to have you ignore any email copies, response, etc to keep you clean and able to resign which will prevent you from getting pulled into anything Voss and Haverstick so hit delete. He is having Philly attorney call me to deal with Friday hearing

12/4/24 5:04:35 PM EST

I will delete.

12/4/24 5:05:20 PM EST

How should I respond to Haverstick ?

12/4/24 5:06:48 PM EST

+17176291559

Delete the email. I just responded.

12/4/24 5:06:59 PM EST

+17176291559

I think you mean Voss not Haverstick

12/4/24 5:08:15 PM EST

Right

12/4/24 5:08:22 PM EST

Deleted

12/4/24 5:09:48 PM EST

Are they still having the contempt hearing?

12/4/24 5:10:16 PM EST

+17176291559

They're implying it's gonna be canceled but until it is, who knows

12/4/24 5:34:01 PM EST

Did you notify Vos that I had resigned?

12/4/24 5:34:46 PM EST

+17176291559

No but I will

12/4/24 5:35:10 PM EST

Ok

12/4/24 5:54:14 PM EST

+17176291559

I certainly accept your resignation, but let's just hold out until we see what happens with this hearing tonight or morning

12/4/24 5:54:27 PM EST

+17176291559

Please confirm that we did move forward with loading the turnpike ATMs?

12/4/24 5:54:34 PM EST

Liked "I certainly accept your resignation, but let's jus..."

12/4/24 5:54:53 PM EST

Yes we did. They should all be loaded this week

12/4/24 9:02:42 PM EST

Hearing still on?

12/4/24 9:05:04 PM EST

+17176291559

Still has not been canceled. They're making ridiculous demands like 50 million wire to them and they will cancel it. I'm still hopeful cooler heads prevail, and we have a couple investors on our side trying to get them to pull back.

Regardless, I'm considering you resigned on December 1 so you're not part of the organization and therefore don't have to show up. I think we need a time to disclosure your resignation and make sure we tie it to the health reasons that you're dealing with. I'm trying to get some guidance from legal.

We are also trying to contract with legal

12/4/24 9:06:22 PM EST

Could you even fund \$50M?

12/4/24 9:06:40 PM EST

+17176291559

They're asking for it to be wired tomorrow, so absolutely not

12/4/24 9:08:27 PM EST

Could you do it later than tomorrow? Like Friday or Monday?

12/4/24 9:11:51 PM EST

I need you to sign the separation agreement so we can make this official. I won't disclose yet but you can let them know as you were copied on the email.

12/4/24 9:14:50 PM EST

If they don't accept this. Then I will need representation. Can your attorney represent me as someone who resigned?

12/4/24 9:16:06 PM EST

+17176291559

It's Paramount not personal representation.

12/4/24 9:16:35 PM EST

Ok. So I will need personal legal representation.

12/4/24 9:17:09 PM EST

+17176291559

It's not Judge order. The attorney was trying to demand that you're there, but only the judge can do that. We will simply respond that you resigned a week ago the health reasons or whatever you wanna say.

We will have representation for Paramount tomorrow. We're working on it tonight.

12/4/24 9:17:22 PM EST

+17176291559

I would just lay low and will sign the document stating back to Friday of last week

12/4/24 9:17:56 PM EST

Ok. Need you to sign separation documents. We can alter later if needed.

12/4/24 9:18:26 PM EST

That's November 29

12/4/24 9:19:18 PM EST

+17176291559

Can you put in the dates? Do you know how to send DocuSign?

12/4/24 9:19:39 PM EST

I can do the dates but don't have docuSign. Can I ask Rose?

12/4/24 9:21:05 PM EST (Edited 12/4/24 9:21:51 PM EST)

Are they demanding \$50M AND the ATMs?

Edited

12/4/24 9:42:52 PM EST

Geez you're famous. WGAL using this to advertise the nightly news.

12/4/24 9:51:02 PM EST

+17176291559

Horrrifying

12/4/24 9:51:17 PM EST

+17176291559

I haven't seen it and hope it's not early negative

12/4/24 9:51:21 PM EST

+17176291559

Overly

12/4/24 9:51:47 PM EST

I didn't see it either. Just an advertisement for the nightly news.

12/4/24 9:52:18 PM EST

ATMs down on turnpike and 138M judgment with photos of our office.

Messages - +17176291559

+17178242965, randall.leanman@gmail.com, dleanman@ptd.net, +17179175670, randall.leanman@paramountmgp.com, +17179172753

12/4/24 9:54:33 PM EST

+17176291559

Whatever

12/4/24 9:54:37 PM EST

+17176291559

And my name?

12/4/24 9:54:58 PM EST

I don't know. It was just a teaser. I assume so.

12/4/24 9:55:25 PM EST

So how does this all end?

12/4/24 9:55:36 PM EST

What makes this go away?

12/5/24 8:06:09 AM EST

Any updates on our situation? Need to have employee meeting today or tomorrow.

12/5/24 8:07:21 AM EST

+17176291559

Still in middle of it. On 8am.

12/5/24 8:07:38 AM EST

Ok

12/5/24 8:54:21 AM EST

will you please send us \$50k for Mid Florida? I think we can get them to continue service if we send them this now and commit to more next week.

12/5/24 10:07:41 AM EST

FBI Raided office at Paramount. Took computers

12/5/24 10:07:46 AM EST

passwords

Messages - +17176291559

+17178242965, randall.leman@gmail.com, dleman@ptd.net, +17179175670, randall.leman@paramountmgp.com, +17179172753

12/5/24 10:07:49 AM EST

etc. 20 agents

12/5/24 10:08:00 AM EST

went to heller capital as well

12/5/24 2:49:16 PM EST

good afternoon Daryl -- This is Randall Leaman

Delivered

Text message  
12/5/24 2:50:12 PM EST

Please respond if you get this



# **EXHIBIT G**

<div> <div> <div>1</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc</div> <div>2</div> <div> <div>3</div> <div>PRESTIGE FUND A, LLC, : et al,</div> <div>4</div> <div>Plaintiff :</div> <div>5</div> <div>vs. :</div> <div>6</div> <div>: No. CI-24-06012</div> <div>7</div> <div>PARAMOUNT MANAGEMENT GROUP, LLC, :</div> <div>8</div> <div>Defendant :</div> <div>9</div> <div></div> <div>10</div> <div></div> <div>11</div> <div>Deposition of AARON R. FOGLEMAN</div> <div>12</div> <div>taken pursuant to notice at the law offices of</div> <div>13</div> <div>Brubaker, Connoughton, Goss &amp; Lucarelli, LLC,</div> <div>14</div> <div>480 New Holland Avenue, Suite 6205, Lancaster,</div> <div>15</div> <div>Pennsylvania, beginning at 12:56 p.m. on</div> <div>16</div> <div>Monday, March 31, 2025, before Allen S. Blank,</div> <div>17</div> <div>Registered Merit Reporter and Notary Public.</div> <div>18</div> <div></div> <div>19</div> <div></div> <div>20</div> <div></div> <div>21</div> <div></div> <div>22</div> <div>-----</div> <div>23</div> <div>ALLEN S. BLANK, RMR</div> <div>24</div> <div>COURT REPORTER-NOTARY PUBLIC</div> <div>25</div> <div>90 Mt. Pleasant Road, Paradise, PA 17562 (717) 687-8942 arblank@juno.com</div> </div> </div> </div>	<div> <div>1</div> <div> <div>2</div> <div> <div>3</div> <div>Examination by Mr. Voss</div> <div>4</div> <div></div> <div>5</div> <div></div> <div>6</div> <div>EXHIBITS</div> <div>7</div> <div>PLAINTIFF'S DEPOSITION EXHIBITS</div> <div>8</div> <div>EXHIBIT 1 Subpoena to Attend and</div> <div>9</div> <div>Testify</div> <div>10</div> <div>EXHIBIT 2 Document captioned Heller</div> <div>11</div> <div>Capital Group</div> <div>12</div> <div></div> <div>13</div> <div></div> <div>14</div> <div>REQUESTS MADE FOR DOCUMENTS</div> <div>15</div> <div>9 24</div> <div>16</div> <div>10 19</div> <div>17</div> <div>11 13</div> <div>18</div> <div>20 16</div> <div>19</div> <div>33 8</div> <div>20</div> <div>55 16</div> <div>21</div> <div></div> <div>22</div> <div></div> <div>23</div> <div></div> <div>24</div> <div></div> <div>25</div> <div></div> </div> </div> </div>
<div> <div>1</div> <div>COUNSEL PRESENT:</div> <div>2</div> <div>JOSHUA J. VOSS, ESQUIRE</div> <div>3</div> <div>SAMANTHA G. ZIMMER, ESQUIRE</div> <div>4</div> <div>KLEINBARD, LLC</div> <div>5</div> <div>Three Logan Square</div> <div>6</div> <div>1717 Arch Street, 5th Floor</div> <div>7</div> <div>Philadelphia, PA 19103</div> <div>8</div> <div>215-568-2000</div> <div>9</div> <div>jvoss@kleinbard.com</div> <div>10</div> <div>szimmer@kleinbard.com</div> <div>11</div> <div>For - Plaintiff</div> <div>12</div> <div>JONATHAN W. CRISP, ESQUIRE</div> <div>13</div> <div>CRISP AND ASSOCIATES, LLC</div> <div>14</div> <div>4031 North Front Street</div> <div>15</div> <div>Harrisburg, PA 17110</div> <div>16</div> <div>717-412-4676</div> <div>17</div> <div>jcrisp@crisplegal.com</div> <div>18</div> <div>For - Witness Aaron W. Fogleman</div> <div>19</div> <div></div> <div>20</div> <div></div> <div>21</div> <div></div> <div>22</div> <div></div> <div>23</div> <div></div> <div>24</div> <div></div> <div>25</div> <div></div> </div>	<div> <div>1</div> <div>STIPULATION</div> <div>2</div> <div>It is hereby stipulated by and between</div> <div>3</div> <div>counsel for the respective parties that</div> <div>4</div> <div>sealing, certification and filing are hereby</div> <div>5</div> <div>waived; and that all objections except as to</div> <div>6</div> <div>the form of the question are reserved to the</div> <div>7</div> <div>time of trial.</div> <div>8</div> <div></div> <div>9</div> <div>AARON R. FOGLEMAN,</div> <div>10</div> <div>the deponent herein, having first been</div> <div>11</div> <div>duly sworn on oath, was examined and</div> <div>12</div> <div>testified as follows:</div> <div>13</div> <div>EXAMINATION</div> <div>14</div> <div>BY MR. VOSS:</div> <div>15</div> <div>Q. Good afternoon, Mr. Fogleman. Is it</div> <div>16</div> <div>okay if I call you Aaron as we proceed?</div> <div>17</div> <div>A. Please do.</div> <div>18</div> <div>Q. Terrific. Thanks, Aaron.</div> <div>19</div> <div>Have you ever been deposed</div> <div>20</div> <div>before?</div> <div>21</div> <div>A. No.</div> <div>22</div> <div>Q. So just a little basic ground rule.</div> <div>23</div> <div>So the main piece is the gentleman to my</div> <div>24</div> <div>right, to your left, is the court reporter.</div> <div>25</div> <div>He is going to write down your answers that</div> </div>

<div>5</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Plaintiff's Deposition Exhibit 7</div> <div>1 come out of your mouth. So when an answer is 2 yes, we need to hear yes. If the answer is 3 no, we need to hear no. Shaking your head 4 isn't going to show up for this gentleman. 5 <b>A. Okay.</b> 6 <b>Q.</b> As much as possible, unlike normal 7 conversation where people kind of talk over 8 each other where we know what the end is going 9 to be, again, for this gentleman's purposes, 10 we need to wait until I'm done even if you 11 know what the question is going to be. And I 12 will do my level best not to talk before 13 you're done. 14 Do you understand that as well? 15 <b>A. Yes.</b> 16 <b>Q.</b> Okay. He has sworn you to tell the 17 truth. And that's the exercise today. We 18 just want to get the facts out of this. And 19 want to know answers to these fairly factual 20 questions. 21 But what we're looking for is 22 answers as precise as you are able to give 23 them. So if you have to guess, I don't really 24 want a guess; and, if your response is, I'd 25 have to guess, that is not a helpful answer</div>	<div>7</div> <div>2 No. 1 was marked for identification.) 3 BY MR. VOSS: 4 <b>Q.</b> I'd like to put in front of you what 5 we have previously marked as Plaintiff's No. 6 1. 7 Have you seen that document 8 before? 9 <b>A. Yes.</b> 10 <b>Q.</b> And I'll just identify for the record, 11 it's a subpoena to attend and testify to 12 Mr. Fogleman. 13 Is that why you're here today, 14 sir? 15 <b>A. Yes.</b> 16 <b>Q.</b> Thank you. 17 All right. Did you prepare for 18 today's deposition? 19 <b>A. Yes.</b> 20 <b>Q.</b> Okay. Who prepared with you? 21 <b>A. I prepared in some form with my</b> 22 <b>attorney, Jonathan. And I prepared by myself</b> 23 <b>by reading some texts.</b> 24 <b>Q.</b> Okay. Anyone else besides your 25 counsel that you prepared with?</div>
<div>6</div> <div>1 because we're not really looking for guesses, 2 we're looking for answers as much as possible. 3 If you have to estimate, that is 4 fine. I'll take an estimate to the extent a 5 question calls for that. But, again, just 6 tell me you're estimating if you understand 7 that? 8 <b>A. Understood.</b> 9 <b>Q.</b> Okay. The last piece, this is a bit 10 of a different deposition. At least for my 11 purposes. I already have a judgement. This 12 deposition is in aid of executing on that 13 judgment. So I'm looking chiefly to find 14 assets. Above all else, my questions are 15 ultimately towards where are things of value. 16 Property, cars, money. So that is sort of the 17 context of why we're here today. 18 Do you understand that? 19 <b>A. Yes.</b> 20 <b>Q.</b> Okay. Before we quickly jump in, are 21 you under any impairments today that would 22 prohibit your ability to answer fully and 23 truthfully, drugs, alcohol, et cetera? 24 <b>A. No.</b> 25 <b>Q.</b> All right. Thank you, sir.</div>	<div>8</div> <div>1 <b>A. No.</b> 2 <b>Q.</b> Did you call anyone to consult? 3 <b>A. No.</b> 4 <b>Q.</b> Okay. 5 <b>A. I told others that I was subpoenaed</b> 6 <b>and was going to be in a deposition. But did</b> 7 <b>not talk about details of it.</b> 8 <b>Q.</b> Terrific. 9 Who did you speak with? 10 <b>A. Dana Schlicker is aware. And then</b> 11 <b>personal friends.</b> 12 <b>Q.</b> Are those personal friends in any way 13 involved in the Heller universe of entities? 14 <b>A. To the best of my knowledge, no.</b> 15 <b>Q.</b> Okay. So we don't need to go through 16 them. 17 I believe I heard you say a 18 moment ago that you looked at some documents. 19 Did I hear you correctly? 20 <b>A. Some text messages.</b> 21 <b>Q.</b> Text messages. 22 What text messages did you look 23 at? 24 <b>A. My text messages between myself and</b> 25 <b>Daryl Heller. And my text messages between</b></div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 776 of 810</div> <div> <div>1 myself, Daryl Heller and Dan Burkholder. And</div> <div>2 my text messages between myself and Barry</div> <div>3 Rynearson. R-y-n-e-a-r-s-o-n.</div> <div>4 Q. What period of time generally did</div> <div>5 these text messages cover?</div> <div>6 A. I don't delete texts. I do think some</div> <div>7 of them are missing. So they go back to 2019.</div> <div>8 I think even into 2018. I believe.</div> <div>9 Q. Okay. I think you said Burkholder is</div> <div>10 one of the folks you spoke with?</div> <div>11 A. Yeah, Dan Burkholder.</div> <div>12 Q. What was his role for Heller Capital</div> <div>13 or any Daryl Heller entities?</div> <div>14 A. He was the president of Heller Capital</div> <div>15 Group.</div> <div>16 Q. Okay. Is he currently?</div> <div>17 A. No.</div> <div>18 Q. Okay. How about Barry Rynearson, what</div> <div>19 was his role?</div> <div>20 A. He was the CFO.</div> <div>21 Q. Of --</div> <div>22 A. Heller Capital.</div> <div>23 MR. VOSS: Okay. I'll call for</div> <div>24 production of those text messages, counsel.</div> <div>25 If you require a formal subpoena, I'm</div> </div> </div>	<div> <div>11</div> <div> <div>2 A. Yes.</div> <div>3 Q. What contract was that?</div> <div>4 A. My employment agreement with Heller</div> <div>5 Capital Group.</div> <div>6 Q. And do you still have a copy of that</div> <div>7 employment agreement?</div> <div>8 A. I do.</div> <div>9 Q. Do you happen to have a copy with you</div> <div>10 today?</div> <div>11 A. I don't.</div> <div>12 Q. Okay.</div> <div>13 MR. VOSS: Same, again, counsel.</div> <div>14 I'll call for production via the employment</div> <div>15 agreement.</div> <div>16 MR. CRISP: Okay.</div> <div>17 BY MR. VOSS:</div> <div>18 Q. All right. Any other preparation work</div> <div>19 you did in anticipation of today's deposition?</div> <div>20 A. To the best of my recollection, no.</div> <div>21 Q. Okay. As an aside. After you</div> <div>22 e-mailed Daryl Heller, did he make any effort</div> <div>23 to reach out to you via text or phone?</div> <div>24 A. Just the response via e-mail.</div> <div>25 Q. And do you know the approximate date</div> </div> </div>
<div> <div>10</div> <div> <div>1 certainly happy to issue that.</div> <div>2 MR. CRISP: Not necessary. But</div> <div>3 I'll get them to you.</div> <div>4 MR. VOSS: Very good.</div> <div>5 BY MR. VOSS:</div> <div>6 Q. In preparation for today, did you</div> <div>7 speak with Daryl Heller?</div> <div>8 A. I didn't. I sent Daryl Heller an</div> <div>9 e-mail asking under indemnification language</div> <div>10 did my employment agree to cover my attorney's</div> <div>11 costs. I did not speak to him in any way,</div> <div>12 shape or form about the deposition or content.</div> <div>13 Q. Okay. Did he respond to that e-mail?</div> <div>14 A. He did.</div> <div>15 Q. What was his response?</div> <div>16 A. That he would cover the cost and he</div> <div>17 asked to get together with me to discuss</div> <div>18 what's going on. And I did not respond.</div> <div>19 MR. VOSS: Counsel, I'll call</div> <div>20 for production of that e-mail as well. Same</div> <div>21 as before. If you require a subpoena, we're</div> <div>22 happy to have one issued.</div> <div>23 BY MR. VOSS:</div> <div>24 Q. You mentioned you sought</div> <div>25 indemnification under a contract. Did I hear</div> </div> </div>	<div> <div>12</div> <div> <div>1 of that e-mail exchange?</div> <div>2 A. I believe it was early last week. But</div> <div>3 we can provide a copy that's date stamped, I'm</div> <div>4 sure.</div> <div>5 Q. That's fine.</div> <div>6 All right. Just a little bit of</div> <div>7 background on you.</div> <div>8 Who is your current employer?</div> <div>9 A. I am currently self-employed.</div> <div>10 Q. And how do you do business, in your</div> <div>11 own name, LLC, partnership?</div> <div>12 A. An LLC.</div> <div>13 Q. What's the name of that LLC?</div> <div>14 A. Koolwali, LLC. K-o-o-l-w-a-l-i, LLC.</div> <div>15 Q. And what services does that entity</div> <div>16 perform?</div> <div>17 A. Business consulting services.</div> <div>18 Q. Business consulting.</div> <div>19 What does that entail just in a</div> <div>20 general sense?</div> <div>21 A. Operational consulting for clients</div> <div>22 that are trying to grow.</div> <div>23 Q. Okay. I want to ask you about your</div> <div>24 work at Heller Capital. Let me start with a</div> <div>25 foundational question. Did you work at Heller</div> </div> </div>

<div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Capital? Certification in Support in that company? Page 777 of 810</div> <div>1 <b>A. I did.</b></div> <div>2 <b>Q. Is the full name of that Heller</b></div> <div>3 <b>Capital Group, LLC?</b></div> <div>4 <b>A. Yes, sir.</b></div> <div>5 <b>Q. Is that the only entity you worked for</b></div> <div>6 <b>that was formed or owned by Daryl Heller?</b></div> <div>7 <b>A. Prior to working at Heller Capital</b></div> <div>8 <b>Group, I worked for Horizon Initiative, which</b></div> <div>9 <b>was a nonprofit that was originally started by</b></div> <div>10 <b>Daryl Heller.</b></div> <div>11 <b>Q. Okay. How long did you work at</b></div> <div>12 <b>Horizon Initiative?</b></div> <div>13 <b>A. I'm very bad with dates. So this</b></div> <div>14 <b>would be an estimate.</b></div> <div>15 <b>Q. Perfect.</b></div> <div>16 <b>A. But it would be from October of 2017</b></div> <div>17 <b>until the end of 2018.</b></div> <div>18 <b>Q. And why did you leave Horizon</b></div> <div>19 <b>Initiative?</b></div> <div>20 <b>A. I was offered work at Heller Capital</b></div> <div>21 <b>Group by Daryl.</b></div> <div>22 <b>Q. Okay. When did you start at Heller</b></div> <div>23 <b>Capital?</b></div> <div>24 <b>A. January 1st of 2019.</b></div>	<div>15</div> <div>2 <b>A. No.</b></div> <div>3 <b>Q. You were never a member or a partner,</b></div> <div>4 <b>however it is denominated?</b></div> <div>5 <b>A. To the best of my knowledge, I was</b></div> <div>6 <b>not.</b></div> <div>7 <b>Q. Okay. Did you ever have an ownership</b></div> <div>8 <b>stake in any Daryl Heller entity, including</b></div> <div>9 <b>the ones you have listed that you worked for?</b></div> <div>10 <b>A. I had an ownership stake. I</b></div> <div>11 <b>purchased -- I mean I invested in the Glorious</b></div> <div>12 <b>Cannabis Company in Michigan.</b></div> <div>13 <b>Q. What's the full name of that?</b></div> <div>14 <b>A. The entity I invested through is BWR</b></div> <div>15 <b>Investments, LLC. And then it resides on the</b></div> <div>16 <b>cap table of GCC Investment Holdings, LLC.</b></div> <div>17 <b>Q. Do you currently hold a stake in</b></div> <div>18 <b>Glorious?</b></div> <div>19 <b>A. I do.</b></div> <div>20 <b>Q. And what's the full name of Glorious?</b></div> <div>21 <b>A. So Glorious is comprised of -- and</b></div> <div>22 <b>this is an estimate -- of 30 entities, I</b></div> <div>23 <b>believe. So the GCC Investment Holding is</b></div> <div>24 <b>where all of the investors are. But the</b></div> <div>25 <b>company that functions as the holding or</b></div>
<div>14</div> <div>1 <b>Q. And when did you end?</b></div> <div>2 <b>A. I should know that date, huh? It was</b></div> <div>3 <b>early December of 2024.</b></div> <div>4 <b>Q. What was your title while you were</b></div> <div>5 <b>there?</b></div> <div>6 <b>A. It changed. Do you want me to go</b></div> <div>7 <b>through the progression?</b></div> <div>8 <b>Q. If you would, sure.</b></div> <div>9 <b>A. Sure. I started as director of</b></div> <div>10 <b>financial optimization. And in 20 --</b></div> <div>11 <b>actually, rough estimate, December of 2019.</b></div> <div>12 <b>Moved to Michigan to work -- I was still W-2</b></div> <div>13 <b>from Heller Capital Group, LLC. But was</b></div> <div>14 <b>working with the cannabis company in Michigan.</b></div> <div>15 <b>And then I moved back. Again, an estimate.</b></div> <div>16 <b>March of 2021. At which time my title changed</b></div> <div>17 <b>to the director of portfolio operations. And</b></div> <div>18 <b>then again I believe it was January of 2022 I</b></div> <div>19 <b>became the chief operating officer. And then</b></div> <div>20 <b>that continued through the end of my</b></div> <div>21 <b>employment.</b></div> <div>22 <b>Q. Okay. A lot to unpack there. I'll</b></div> <div>23 <b>try to get them one at a time.</b></div> <div>24 <b>Focusing just on Heller Capital</b></div> <div>25 <b>for a minute. Did you have an ownership stake</b></div>	<div>16</div> <div>1 <b>parent company is GCC Holding. Do you know</b></div> <div>2 <b>what? I'm not a hundred percent sure of the</b></div> <div>3 <b>name.</b></div> <div>4 <b>Q. Okay.</b></div> <div>5 <b>A. I'm sorry.</b></div> <div>6 <b>Q. Let's go through some of these.</b></div> <div>7 <b>BWR Investments, does Daryl</b></div> <div>8 <b>Heller have an interest in that company?</b></div> <div>9 <b>A. No.</b></div> <div>10 <b>Q. GCC, I think, LLC --</b></div> <div>11 <b>A. Investment Holdings.</b></div> <div>12 <b>Q. Investment Holdings.</b></div> <div>13 <b>Does Daryl Heller have an</b></div> <div>14 <b>interest in that?</b></div> <div>15 <b>A. He does.</b></div> <div>16 <b>Q. What's his interest in that?</b></div> <div>17 <b>A. That's a complicated question.</b></div> <div>18 <b>Because he invests through multiple LLCs. But</b></div> <div>19 <b>it's significant. I believe him to be the</b></div> <div>20 <b>larger shareholder.</b></div> <div>21 <b>Q. Him personally?</b></div> <div>22 <b>A. Heller Investment Holdings.</b></div> <div>23 <b>Q. Okay.</b></div> <div>24 <b>A. Which is owned I believe, to the best</b></div> <div>25 <b>of my recollection, a hundred percent by him.</b></div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc</div> <div> <div>17</div> <div>1 Q. Did he have a title at GCC, president</div> <div>2 CEO, chairman, something like that?</div> <div>3 A. I'm not aware.</div> <div>4 Q. Okay. So when you say Glorious,</div> <div>5 you're sort of talking about a constellation</div> <div>6 of businesses?</div> <div>7 A. Yes.</div> <div>8 Q. Okay. And ultimately what do the</div> <div>9 Glorious businesses do?</div> <div>10 A. Cannabis manufacturing.</div> <div>11 Q. Manufacturing only?</div> <div>12 A. To the best of my recollection, it</div> <div>13 was, yeah, growing and manufacturing.</div> <div>14 Q. No dispensaries?</div> <div>15 A. There were dispensaries at one point</div> <div>16 in time. But I believe that they are closed.</div> <div>17 Q. Do you know when those dispensaries</div> <div>18 closed?</div> <div>19 A. I don't even know. I could put an</div> <div>20 educated guess.</div> <div>21 Q. I'd take an educated guess on this</div> <div>22 one.</div> <div>23 A. Okay. Let me think about it.</div> <div>24 I would think that it was</div> <div>25 somewhere around early 2022.</div> </div> </div>	<div> <div>19</div> <div>1 A. Yes.</div> <div>2 Q. And that's what generates the revenue?</div> <div>3 A. Yeah. I mean it's a holding company.</div> <div>4 But, yes.</div> <div>5 Q. So you get a K-1 from BWR but you</div> <div>6 don't get any sort of document from GSS</div> <div>7 Investment Holdings?</div> <div>8 A. No.</div> <div>9 Q. Okay. Is there a connection between</div> <div>10 Glorious and something called I believe Choice</div> <div>11 Labs?</div> <div>12 A. To the best of my knowledge, there is.</div> <div>13 Q. What is the connection?</div> <div>14 A. Glorious was purchasing Choice Labs.</div> <div>15 Q. I see. Okay.</div> <div>16 A. Purchased.</div> <div>17 Q. And when was that?</div> <div>18 A. Oh, man. I'm so sorry. I'm very bad</div> <div>19 with dates.</div> <div>20 Q. I'll take an estimate.</div> <div>21 A. Late 2023. It is very much an</div> <div>22 estimate. October of 2023.</div> <div>23 Q. Sure.</div> <div>24 What was the purchase price?</div> <div>25 A. So I do not actually remember. I know</div> </div>
<div> <div>18</div> <div>1 Q. Okay. Where does Glorious do</div> <div>2 business? What states?</div> <div>3 A. To the best of my recollection,</div> <div>4 Michigan, Massachusetts. And the last I was</div> <div>5 involved they are expanding into New York and</div> <div>6 Illinois. But I do not -- I am not aware of</div> <div>7 whether or not either of those facilities were</div> <div>8 turned on and operational.</div> <div>9 Q. Sure.</div> <div>10 How do you get paid out of GCC?</div> <div>11 And I have a very specific question on this.</div> <div>12 Were you a K-1? Did you get a</div> <div>13 distribution? Do you get a W-2? Do you</div> <div>14 get -- how physically, this doesn't describe</div> <div>15 the money. But what kind of document do you</div> <div>16 get? Do you get a K-1 or a W-2?</div> <div>17 A. I get a K-1 from BWR.</div> <div>18 Q. BWR?</div> <div>19 A. Yes.</div> <div>20 Q. Which is not a Heller entity?</div> <div>21 A. Yes.</div> <div>22 Q. Okay. But your investment is</div> <div>23 ultimately in GCC Investments?</div> <div>24 A. Investment Holdings.</div> <div>25 Q. Investment Holdings?</div> </div>	<div> <div>20</div> <div>1 I've seen it. It was in an investment deck</div> <div>2 that I helped put together for the investors.</div> <div>3 But it was a combination of stock in the</div> <div>4 larger holding company and a cash payment.</div> <div>5 But I honestly don't recall the terms.</div> <div>6 Q. You referred a moment ago to an</div> <div>7 investment deck. Is that a PDF?</div> <div>8 A. It was a PowerPoint but also a PDF.</div> <div>9 Q. And who would hold that PowerPoint?</div> <div>10 A. I mean a copy of it would likely very</div> <div>11 much still be in my files. Because I did the</div> <div>12 PowerPoint decks. Because I made them. The</div> <div>13 investors also saw it and it was recorded. I</div> <div>14 believe the investors have it as well.</div> <div>15 MR. VOSS: I would call for</div> <div>16 production of that as well.</div> <div>17 MR. CRISP: We don't have access</div> <div>18 to any of that.</div> <div>19 THE WITNESS: I don't have</div> <div>20 access. I'm sorry. When I say my files, I</div> <div>21 meant my Heller Capital files. I apologize.</div> <div>22 I don't work there anymore.</div> <div>23 BY MR. VOSS:</div> <div>24 Q. Perfect clarification.</div> <div>25 What I meant was, do you</div> </div>

<div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 779 of 810</div> <div>21</div> <p>1 personally have that deck?</p> <p>2 <b>A. I do not.</b></p> <p>3 <b>Q.</b> But conceivably Heller Capital still</p> <p>4 has the files that you worked on when you</p> <p>5 worked there?</p> <p>6 <b>A. I believe that they would, yes.</b></p> <p>7 <b>Q.</b> Right. If they're gone from there,</p> <p>8 you don't have access to them?</p> <p>9 <b>A. Yeah.</b></p> <p>10 <b>Q.</b> Okay. Very good.</p> <p>11 MR. CRISP: You're withdrawing</p> <p>12 your request?</p> <p>13 MR. VOSS: Request withdrawn.</p> <p>14 Indeed.</p> <p>15 BY MR. VOSS:</p> <p>16 <b>Q.</b> When you went to Michigan, you said</p> <p>17 you worked for a cannabis company. Which</p> <p>18 cannabis company did you work for in Michigan?</p> <p>19 <b>A. The same group of entities under a</b></p> <p>20 <b>different naming structure at the time.</b></p> <p>21 <b>Q.</b> Okay. And what was the naming</p> <p>22 structure at the time?</p> <p>23 <b>A. They were -- this is a very</b></p> <p>24 <b>complicated answer.</b></p> <p>25 <b>They were broken into individual</b></p>	<div>23</div> <p>2 <b>number was 19.</b></p> <p>3 <b>Q.</b> 19. And at its lowest while you were</p> <p>4 there?</p> <p>5 <b>A. When I started, Heller Capital was,</b></p> <p>6 <b>including me, four.</b></p> <p>7 <b>Q.</b> Okay.</p> <p>8 <b>A. Not including Daryl Heller in either</b></p> <p>9 <b>one of those numbers. Although he is the</b></p> <p>10 <b>owner. So he wasn't a W-2.</b></p> <p>11 MR. CRISP: He was or was not?</p> <p>12 THE WITNESS: He was not. He</p> <p>13 was guaranteed payments.</p> <p>14 BY MR. VOSS:</p> <p>15 <b>Q.</b> What were his guaranteed payments?</p> <p>16 <b>A. To the best of my recollection, it was</b></p> <p>17 <b>I think he was -- it was 18,000 biweekly.</b></p> <p>18 <b>Q.</b> Biweekly?</p> <p>19 <b>A. Yes, sir.</b></p> <p>20 <b>Q.</b> So 56K a month, roughly. But over the</p> <p>21 year, biweekly, 26 times?</p> <p>22 <b>A. Yeah.</b></p> <p>23 <b>Q.</b> 18K?</p> <p>24 <b>A. Again, that's an estimate.</b></p> <p>25 <b>Q.</b> Okay. I want to go into Heller</p>
<div>22</div> <p>1 <b>project groups. And when Glorious decided to</b></p> <p>2 <b>purchase Choice, they did a very large</b></p> <p>3 <b>reorganization that restructured into that GCC</b></p> <p>4 <b>Investment Holdings, as we discussed.</b></p> <p>5 <b>And so at the time it was just</b></p> <p>6 <b>individual projects. And I was not W-2 by</b></p> <p>7 <b>them, I was W-2 by Heller Capital Group at the</b></p> <p>8 <b>time.</b></p> <p>9 <b>Q.</b> Did your W-2 ever change from 2019 to</p> <p>10 2024?</p> <p>11 <b>A. It did not.</b></p> <p>12 <b>Q.</b> So you were always an employee of</p> <p>13 Heller Capital?</p> <p>14 <b>A. Yes, sir.</b></p> <p>15 <b>Q.</b> So you were paid a salary?</p> <p>16 <b>A. Yes.</b></p> <p>17 <b>Q.</b> Okay. Bonuses on top of that?</p> <p>18 <b>A. Yes.</b></p> <p>19 <b>Q.</b> Is that the typical payment structure</p> <p>20 for the employees of Heller Capital?</p> <p>21 <b>A. Yes.</b></p> <p>22 <b>Q.</b> Okay. How many employees at its sort</p> <p>23 of highest number while you were there at</p> <p>24 Heller Capital?</p> <p>25 <b>A. This would be an estimate. Because my</b></p>	<div>24</div> <p>1 Capital a little bit more.</p> <p>2 Can you identify the officers by</p> <p>3 year when you were there? And by officers,</p> <p>4 I'm looking for kind of CEO, CFO, COO?</p> <p>5 <b>A. By years, it is going to be hard for</b></p> <p>6 <b>me.</b></p> <p>7 <b>Q.</b> To the best of your recollection?</p> <p>8 <b>A. To the best of my recollection, Barry</b></p> <p>9 <b>Rynearson was the CFO starting when I started.</b></p> <p>10 <b>January of 2019.</b></p> <p>11 <b>Q.</b> Okay.</p> <p>12 <b>A. Neal Leininger was the chief projects</b></p> <p>13 <b>officer. And I think that happened in 2021.</b></p> <p>14 <b>But I could definitely be wrong about that.</b></p> <p>15 <b>Q.</b> Okay.</p> <p>16 <b>A. Dan Burkholder was the president in</b></p> <p>17 <b>2021. I was the chief operating officer in</b></p> <p>18 <b>2022. And then Erin Farabaugh was the chief</b></p> <p>19 <b>legal officer. And I, it is very, very much</b></p> <p>20 <b>an estimate. But I think it was very early</b></p> <p>21 <b>2023.</b></p> <p>22 <b>Q.</b> At some point did Dana Schlicker</p> <p>23 become the CFO?</p> <p>24 <b>A. No.</b></p> <p>25 <b>Q.</b> No?</p>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Certification in Support of Plaintiff's Motion for Summary Judgment Page 780 of 810</div> <div> <p>1 <b>A. Not to the best of my knowledge</b></p> <p>2 <b>Q.</b> What was her title while you were</p> <p>3 there?</p> <p>4 <b>A. Director of finance.</b></p> <p>5 <b>Q.</b> Director of finance. Okay.</p> <p>6 What's the difference in roles</p> <p>7 between the CFO and director of finance at</p> <p>8 Heller Capital?</p> <p>9 <b>A. To the best of my understanding,</b></p> <p>10 <b>because I didn't really work with that at</b></p> <p>11 <b>Heller Capital. The CFO was more higher level</b></p> <p>12 <b>strategic. Dealt with loans, mergers and</b></p> <p>13 <b>acquisitions. Larger transaction style.</b></p> <p>14 <b>And then the director of finance</b></p> <p>15 <b>was more of the day-to-day tactical financial</b></p> <p>16 <b>responsibilities.</b></p> <p>17 <b>Q.</b> I see.</p> <p>18 Was there an accounting</p> <p>19 department at Heller Capital?</p> <p>20 <b>A. Yes.</b></p> <p>21 <b>Q.</b> Do you know some of the folks who were</p> <p>22 in that department? And if it's legion, let</p> <p>23 me know. But if it's less than ten, maybe you</p> <p>24 can give me as many names as you can remember?</p> <p>25 <b>A. I did oversee the HR department. The</b></p> </div> </div>	<div> <div>25 Entered 04/25/25 14:39:18 Desc Page 780 of 810</div> <div> <p>27</p> <p>2 <b>deals. So usually in the form of purchasing</b></p> <p>3 <b>entities.</b></p> <p>4 <b>Q.</b> Okay. Is it fair to say he was in</p> <p>5 charge of Heller Capital?</p> <p>6 <b>A. Very much so.</b></p> <p>7 <b>Q.</b> Any major decision made that he didn't</p> <p>8 make?</p> <p>9 <b>A. Not to the best of my recollection.</b></p> <p>10 <b>Q.</b> Could he be described as a micro</p> <p>11 manager?</p> <p>12 <b>A. In some ways, yes.</b></p> <p>13 <b>Q.</b> What are those ways?</p> <p>14 <b>A. I don't know how to word this in like</b></p> <p>15 <b>an eloquent fashion. But his deals often</b></p> <p>16 <b>lacked a lot of detail and his team following</b></p> <p>17 <b>behind him in an effort to clean up the detail</b></p> <p>18 <b>and structure it and make everything just</b></p> <p>19 <b>meant that everything, like every answer to</b></p> <p>20 <b>every question had to go through him. It's</b></p> <p>21 <b>not that he intentionally did that. He just</b></p> <p>22 <b>kind of created a little bit of challenge.</b></p> <p>23 <b>Q.</b> It seemed eloquent to me.</p> <p>24 <b>A. Thank you.</b></p> <p>25 <b>Q.</b> I'm going to explore Heller Capital a</p> <p>little bit more fully. But another functional</p> </div> </div>
<div> <div>26</div> <div> <p>1 <b>finance department was Dana Schlicker. And</b></p> <p>2 <b>then below her, and I can't give you titles or</b></p> <p>3 <b>dates. Because I honestly wouldn't remember</b></p> <p>4 <b>that.</b></p> <p>5 <b>Q.</b> I'm just looking for names.</p> <p>6 <b>A. Below that was Pete Wisniewski. And I</b></p> <p>7 <b>could look on my phone if you want me to spell</b></p> <p>8 <b>that. Because I don't know how.</b></p> <p>9 <b>Q.</b> We'll handle that afterward with the</p> <p>10 court reporter.</p> <p>11 <b>A. Okay. Josh Baker. Austin Quinones.</b></p> <p>12 <b>And Tyler Lutz.</b></p> <p>13 MR. CRISP: Pause for a minute.</p> <p>14 Baker and Quinones, grab me on those two when</p> <p>15 you're done here.</p> <p>16 BY MR. VOSS:</p> <p>17 <b>Q.</b> When you were at Heller Capital, what</p> <p>18 was Daryl Heller's role?</p> <p>19 <b>A. He served as, to the best of my</b></p> <p>20 <b>recollection, as chief executive officer.</b></p> <p>21 <b>Q.</b> And what did he do kind of on a</p> <p>22 day-to-day, month-to-month, year-to-year</p> <p>23 basis?</p> <p>24 <b>A. Daryl was a -- he liked to function in</b></p> <p>25 <b>the capacity of negotiating and creating</b></p> </div> </div>	<div> <div>28</div> <div> <p>1 question.</p> <p>2 I'm mail interested in the books</p> <p>3 and records you had access to while you were</p> <p>4 there. What generally, what systems were</p> <p>5 available to you? Could you see everything or</p> <p>6 were you limited to some program or were you</p> <p>7 limited to some file on the computer? What</p> <p>8 was your level of access to the books and</p> <p>9 records while you were there?</p> <p>10 <b>A. I had had access to certain QuickBook</b></p> <p>11 <b>files depending on the companies that I was</b></p> <p>12 <b>working with at the time. My, to the best of</b></p> <p>13 <b>my understanding and knowledge, all of the</b></p> <p>14 <b>Heller Capital entities, honestly, with the</b></p> <p>15 <b>exclusion of the ones that the Heller Capital</b></p> <p>16 <b>team didn't work with, were in QuickBooks.</b></p> <p>17 <b>And when I was specific to a company, I would</b></p> <p>18 <b>usually have access to that company's</b></p> <p>19 <b>QuickBooks files.</b></p> <p>20 <b>Q.</b> Was there anything you were excluded</p> <p>21 from?</p> <p>22 <b>A. Yes.</b></p> <p>23 <b>Q.</b> Give me as many examples as you can</p> <p>24 think of, please?</p> <p>25 <b>A. Oh, my gosh.</b></p> </div> </div>



<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc</div> <div>So to the best of my recollection, Heller Capital was comprised of a lot of LLCs. I mean there is really a lot of them. I mean I know it's over a hundred. Without going into any specific number.</div> <div>And so, again, to the best of my recollection, I maybe had access to two or three. So to list the ones I didn't have access to would be more challenging than to list the ones I had access to at some point in time.</div> <div>Q. And that's a fair answer.</div> <div>Did there ever come a time when you asked for access from Daryl and it was denied?</div> <div>A. There was an incident. It's not -- I was not asking for financials, to be clear. In my capacity as the chief operating officer, I was trying to collect KPIs, key performance indicators, for each one of the companies.</div> <div>Q. Each of the hundred?</div> <div>A. No. The operating entities. I apologize. So a lot of those LLCs are special purpose entities that served the purpose of owning a piece of real estate. And I don't</div> </div>	<div> <div>31</div> <div>statistics and that he would speak with Daryl about it. And then that was the last I heard about it.</div> <div>Q. Did you hear anything from Daryl?</div> <div>A. I never talked to Daryl about it. I talked to Dan Burkholder about it out of frustration. And Dan just -- I don't remember the followup. I just remember that Dan said he was going to look into it.</div> <div>Q. And did Dan get back to you?</div> <div>A. To the best of my recollection, I do not remember him getting back to me on that.</div> <div>Q. Can you explain that KPI to somebody like me who heard it for the first time five minutes ago?</div> <div>A. Yeah. Sure.</div> <div>So, you know, our KPIs would be -- sometimes they were financial metrics, sometimes they were not. So I can give you some for instances here.</div> <div>Q. That would be helpful.</div> <div>A. At the restaurant, and I'm struggling to remember under like a more strenuous situation so my brain isn't processing. So just give me one second.</div> </div>
<div> <div>30</div> <div>know the legal purpose for that. But they tell us that's a thing that you're supposed to do.</div> <div>So, no, the operating entities specifically. We just wanted KPIs for the entities that were doing business. And we wanted to be able to track their performance from a KPI perspective. And then on the other side the financial team was trying to track the financial metrics.</div> <div>And for the most part, I had a lot of those KPIs from some of the companies. We collected a decent amount of them. I reached out actually directly to Steve Gernes, who was the chief operating officer at Paramount, for a copy of their KPIs.</div> <div>I don't recall when this was. It, to the best estimate, would be in 2023 at some point in time.</div> <div>And I didn't receive a response. And I followed up on my request. And I received a response from Randall Leaman, who was I believe his title was president at the time. Who just said that Daryl Heller preferred that they not share those types of</div> </div>	<div> <div>32</div> <div>So at the restaurant, for instance, a good KPI would be, you know, the seat turns. How many times did a table have a full seating and have a full payment for that seating.</div> <div>You know, we wanted to do roughly two and a half seat turns a night. That meant that the restaurant had performed well on all the tables in the restaurant.</div> <div>Q. I see.</div> <div>A. Does that make sense?</div> <div>Q. It does.</div> <div>And you said you were trying to get KPIs for the operating entities. Do you recall what the operating entities were by name?</div> <div>A. I can recall quite a few of them. Actually, Jonathan, I gave you a chart.</div> <div>MR. CRISP: Give me a second. I can e-mail it to you right now if you have access to it.</div> <div>Actually, I do have it still in my bag.</div> <div>THE WITNESS: This is very much an estimate. Like this is from my</div> </div>

<div> <div>33</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 782 of 810</div> <div> <div>1</div> <div>recollection I put together for Jonathan for</div> <div>2</div> <div>us to review.</div> <div>3</div> <div>MR. CRISP: Okay. This?</div> <div>4</div> <div>THE WITNESS: Yes.</div> <div>5</div> <div>MR. CRISP: I can get you a</div> <div>6</div> <div>color version if you want.</div> <div>7</div> <div>MR. VOSS: I'll call for</div> <div>8</div> <div>production of the chart.</div> <div>9</div> <div>MR. CRISP: If you want to take</div> <div>10</div> <div>a look at it. Let me give it to him and he</div> <div>11</div> <div>can tell you and then I'll share it with you.</div> <div>12</div> <div>BY MR. VOSS:</div> <div>13</div> <div>Q. The name of the operating entity?</div> <div>14</div> <div>A. <b>Yeah. So Avail Technology Solutions,</b></div> <div>15</div> <div><b>LLC.</b></div> <div>16</div> <div>Q. Okay. You're going to need to speak</div> <div>17</div> <div>slower because he is going to have to type</div> <div>18</div> <div>them.</div> <div>19</div> <div>A. <b>Premiere Technology Group, LLC,</b></div> <div>20</div> <div><b>Elevated Holdings, LLC, ProSportsman, LLC, H2</b></div> <div>21</div> <div><b>Ventures, LLC, PG Pharma, LP, BitStop</b></div> <div>22</div> <div><b>Holdings, LLC.</b></div> <div>23</div> <div>Actually, again, these legal</div> <div>24</div> <div>names are estimates. I don't recall exactly.</div> <div>25</div> <div>I put this together after my employment there</div> </div> </div>	<div> <div>35</div> <div>THE WITNESS: I'm sure we'll</div> <div>2</div> <div>talk about that.</div> <div>3</div> <div>BY MR. VOSS:</div> <div>4</div> <div>Q. We're up to Invari?</div> <div>5</div> <div>A. <b>Yep.</b></div> <div>6</div> <div>Q. I-n-v-a-r-i. Okay.</div> <div>7</div> <div>A. <b>Datastaff, LLC. I put here Blackford</b></div> <div>8</div> <div><b>Funds. I do not know the legal names of</b></div> <div>9</div> <div><b>those. And I believe there are many. And I</b></div> <div>10</div> <div><b>don't know. Yeah, I just don't know. So I</b></div> <div>11</div> <div><b>just wrote funds.</b></div> <div>12</div> <div>Cash Venture Fund is also the</div> <div>13</div> <div>same.</div> <div>14</div> <div>MR. CRISP: You said that really</div> <div>15</div> <div>quickly. You said what?</div> <div>16</div> <div>THE WITNESS: Cash Ventures</div> <div>17</div> <div>Funds. I also don't know the legal entities.</div> <div>18</div> <div>Paramount Management Group, LLC.</div> <div>19</div> <div>Prestige Investment Group, LLC.</div> <div>20</div> <div>And then I believe, to the best</div> <div>21</div> <div>of my knowledge, Prestige has quite a few</div> <div>22</div> <div>funds as well. I didn't know any of those.</div> <div>23</div> <div>Sharenet, LLC, Powerquest</div> <div>24</div> <div>Financial, LLC, and First Regents, LLC.</div> <div>25</div> <div>So that's Heller Capital Group's</div> </div>
<div> <div>34</div> <div>and I didn't have access to documents.</div> <div>2</div> <div>DDRB, LLC.</div> <div>3</div> <div>Q. David Richard Boy, DDRB?</div> <div>4</div> <div>A. <b>DDRB, yes. David Richard Boy. Yes.</b></div> <div>5</div> <div><b>Yep.</b></div> <div>6</div> <div>Sorry. I didn't know what you</div> <div>7</div> <div>were doing. I thought you were trying to name</div> <div>8</div> <div>the members. I was like, I don't think that's</div> <div>9</div> <div>who they were. Sorry. That's silly.</div> <div>10</div> <div>PowerCoin, LLC, Project</div> <div>11</div> <div>Catapult, LLC, Procurement Analysis and</div> <div>12</div> <div>Strategy, LLC, Invari, LLC.</div> <div>13</div> <div>Q. Can you spell that?</div> <div>14</div> <div>A. <b>I-n-v-a-r-i.</b></div> <div>15</div> <div>If you guys want to follow</div> <div>16</div> <div>along, I'm literally going across this.</div> <div>17</div> <div>MR. CRISP: You can zoom in with</div> <div>18</div> <div>your finger if you want. I can e-mail it to</div> <div>19</div> <div>you as well.</div> <div>20</div> <div>MR. VOSS: Yeah. I'm going to</div> <div>21</div> <div>ask you to read them just because we don't</div> <div>22</div> <div>have a copy. We can put it in the record.</div> <div>23</div> <div>MR. CRISP: And I'm going to</div> <div>24</div> <div>want to know what the dots are. It was very</div> <div>25</div> <div>helpful.</div> </div>	<div> <div>36</div> <div>operating entities.</div> <div>2</div> <div>The chart below that under</div> <div>3</div> <div>Heller Investment Holdings, GCC Investment</div> <div>4</div> <div>Holdings, LLC, we talked about that entity.</div> <div>5</div> <div>DOBE Investment. I don't know</div> <div>6</div> <div>the legal name of that. So I didn't try to</div> <div>7</div> <div>put it.</div> <div>8</div> <div>Superior Holdings, LLC. And</div> <div>9</div> <div>Lifted NY, which was ElectraLeaf.</div> <div>10</div> <div>MR. VOSS: Okay. I think what</div> <div>11</div> <div>we'll do. I'd like to mark this Plaintiff's</div> <div>12</div> <div>2. Although we don't have a copy of that, we</div> <div>13</div> <div>can produce it at this time. But the witness</div> <div>14</div> <div>has one and I think we'll enter that into the</div> <div>15</div> <div>record afterwards if it's fine with counsel</div> <div>16</div> <div>and the witness?</div> <div>17</div> <div>MR. CRISP: Sure.</div> <div>18</div> <div>(Discussion held off the</div> <div>19</div> <div>record.)</div> <div>20</div> <div>(Plaintiff's Deposition Exhibit</div> <div>21</div> <div>No. 2 was marked for identification.)</div> <div>22</div> <div>BY MR. VOSS:</div> <div>23</div> <div>Q. All right. So we have now marked for</div> <div>24</div> <div>the record Plaintiff's 2, which is the chart</div> <div>25</div> <div>that we were just reading from a minute ago.</div> </div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Can you just tell us where this Certification in Support chart came from?</div> <div> <div>A. Yeah. I put it together in preparation to speak with my counsel about this deposition.</div> <div>Q. Okay. Very good.</div> <div>All right. So we went through the entities on this. I see that there are some colored dots on here. Let's start with the pink ones, which appear to say HR aaS.</div> <div>What does that stand for?</div> <div>A. So we called that HR as a service. In a lot of instances, it was easier to have one HR department with so many small companies rather than each company having their own HR department.</div> <div>Q. I see.</div> <div>A. So any entity with a pink dot is an entity that we did HR for.</div> <div>Q. Okay. Let's go to the blue dot.</div> <div>Finance aaS.</div> <div>What does that blue finance dot indicate?</div> <div>A. So we call that finance as a service.</div> <div>Again, small entities didn't need their own</div> </div> </div>	<div> <div>37</div> <div>Page 783 of 810</div> <div>What does passive role mean?</div> <div>A. So a passive role, again, flexible definition. It meant that the company had its own team and we were mostly overseeing -- the Heller Capital executive team was mostly overseeing it just from a financial end in like KPI respects. We were just kind of making sure it was on target. And, yeah.</div> <div>Q. I see.</div> <div>And then the no role, just tell us what that means in your words?</div> <div>A. Yeah. It was a company that was fully functioning, had its own team. And then other than Daryl, they didn't communicate often with the Heller Capital team.</div> <div>Q. Okay. And on your flow chart here, I see little percentages at various points. What do the percentages indicate?</div> <div>A. They were estimates of, because we had a database of like all of the investors for each company. So from my best recollection, I put the percentages that Heller Capital owned in those individual entities.</div> <div>MR. CRISP: This would have been as of what date just so you're clear?</div> </div>
<div> <div>38</div> <div>finance department. So it was Heller Capital's finance team that did the financial reports for those entities.</div> <div>Q. I see.</div> <div>And then there are some green-colored or, excuse me, there is colors associated with the boxes. Some of them green, some of them blue, some of them I would call it a pink.</div> <div>What does the green active role, what does that mean?</div> <div>A. So, and these I would like to be clear that these definitions are going to be pretty flexible. Because it all depended on a company's need at the time.</div> <div>When I say it was an active role, I mean that the Heller Capital team was pretty involved in the day-to-day management of those companies. We sat in board meetings. Well, the executives sat in some of the board meetings. And we were in pretty regular communication with their executive team and sometimes even their team itself in helping them operate.</div> <div>Q. The blue passive role.</div> </div>	<div> <div>40</div> <div>THE WITNESS: As of my leaving sometime in December of 2024.</div> <div>BY MR. VOSS:</div> <div>Q. I see.</div> <div>And just so I'm clear on this. Paramount Management Group, you think 83 percent was owned by Heller Capital as of December 2024?</div> <div>A. To the best of my recollection, yes.</div> <div>Q. And who would have been the other 17 percent in Paramount?</div> <div>A. To the best of my recollection, it was 12 percent Randall Leaman and five percent Dennis Ream.</div> <div>Q. Okay. Just two more quick questions. And this is sort of an I'll call it corporate officer chart in the bottom right side. And there is four boxes that have colors. One in magenta and one in a pretty dark blue, or two in the dark blue and two in the magenta.</div> <div>What do the color schemes mean?</div> <div>A. They reference back to the dots. So the magenta team is just the HR team, which fell under Mike Kipphorn. And ultimately under me.</div> </div>

<div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc And then the blue team, the Certification in Support Page 784 of 810</div> <div> <p>1 financial services team, falls under Barry.</p> <p>2 <b>Q.</b> I see.</p> <p>3 Did you have access to the banks</p> <p>4 where these various LLCs kept their money?</p> <p>5 <b>A.</b> Some of them I did.</p> <p>6 <b>Q.</b> Okay. And did you have a way to</p> <p>7 organize those banks?</p> <p>8 <b>A.</b> Yes. We -- and I can't recall a date</p> <p>9 that we did that. But we went from -- we</p> <p>10 migrated from Excel documents that stored most</p> <p>11 of that data to a database that I was the</p> <p>12 chief architect of to store that data.</p> <p>13 <b>Q.</b> And what was that database called?</p> <p>14 <b>A.</b> We did it in the Salesforce platform.</p> <p>15 <b>Q.</b> And can you describe that to me, the</p> <p>16 Salesforce platform? I'm not familiar.</p> <p>17 <b>A.</b> Sure. Salesforce is actually, it's a</p> <p>18 customer relationship management software. So</p> <p>19 it's really meant for marketing and sales.</p> <p>20 But it's just an infinitely customizable</p> <p>21 database that you can create, like you can</p> <p>22 create tables and tables that relate to those</p> <p>23 tables.</p> <p>24 So we created in Salesforce a</p> </div>	<div>43</div> <div> <p>1 <b>Q.</b> Okay. Was that Salesforce database</p> <p>2 active when you left Heller Capital?</p> <p>3 <b>A.</b> To the best of my knowledge, yes, it</p> <p>4 was.</p> <p>5 <b>Q.</b> And if one had access to that</p> <p>6 database, what, in terms of financial data,</p> <p>7 would it show?</p> <p>8 Maybe that's a long answer,</p> <p>9 maybe it's short.</p> <p>10 <b>A.</b> It's actually a pretty short answer.</p> <p>11 So the only financial data that</p> <p>12 would be in there would be investors, their</p> <p>13 contributions and percent ownerships. And</p> <p>14 bank account numbers and which bank it was at</p> <p>15 and who was the primary contact for that bank.</p> <p>16 <b>Q.</b> I see.</p> <p>17 And to get access to that</p> <p>18 database, did it exist locally on a computer</p> <p>19 or was it in the Cloud? How did you get</p> <p>20 access to it?</p> <p>21 <b>A.</b> That database is in the Cloud.</p> <p>22 <b>Q.</b> Okay. And you needed a user name and</p> <p>23 password to get access?</p> <p>24 <b>A.</b> Yes.</p> </div>
<div>42</div> <div> <p>1 way to track a lot of the data that was</p> <p>2 managed by the Heller Capital team on a</p> <p>3 regular basis.</p> <p>4 <b>Q.</b> Do you know the full name of that</p> <p>5 business, Salesforce?</p> <p>6 <b>A.</b> I apologize. I do not.</p> <p>7 <b>Q.</b> Okay. And was there a contract for</p> <p>8 those database services?</p> <p>9 <b>A.</b> Yes, there was.</p> <p>10 <b>Q.</b> And who was the party to that</p> <p>11 contract?</p> <p>12 <b>A.</b> Heller Capital.</p> <p>13 <b>Q.</b> Okay. Did that Salesforce database</p> <p>14 include financial data for Paramount</p> <p>15 Management Group?</p> <p>16 <b>A.</b> It did not.</p> <p>17 <b>Q.</b> It did not.</p> <p>18 Do you know where financial data</p> <p>19 for Paramount Management Group would have</p> <p>20 resided?</p> <p>21 <b>A.</b> This is a, to my knowledge. I was</p> <p>22 told this. I never saw it. But I believe</p> <p>23 they were using Microsoft -- shucks. I</p> <p>24 believe they were using Microsoft Business</p> <p>25 Central, which is an ERP hosted on the</p> </div>	<div>44</div> <div> <p>1 <b>Q.</b> Who had the user names and passwords</p> <p>2 for that?</p> <p>3 <b>A.</b> Everybody at Heller Capital had a user</p> <p>4 name and password.</p> <p>5 <b>Q.</b> Including Daryl Heller?</p> <p>6 <b>A.</b> Yes. But to the best of my knowledge,</p> <p>7 Daryl never logged into that. He doesn't</p> <p>8 know. That was for us to operate. Like he</p> <p>9 wouldn't even know how to use it. Again, to</p> <p>10 my knowledge.</p> <p>11 <b>Q.</b> And who is the us in your answer? You</p> <p>12 said for us to operate.</p> <p>13 <b>A.</b> Sorry. For the Heller Capital team to</p> <p>14 operate.</p> <p>15 <b>Q.</b> Yes. Specifically by name, though.</p> <p>16 <b>A.</b> All members.</p> <p>17 <b>Q.</b> All 19 that were on staff?</p> <p>18 <b>A.</b> Yeah, to the best of my knowledge, all</p> <p>19 19 had access to the system.</p> <p>20 <b>Q.</b> Perfect.</p> <p>21 MR. CRISP: Can I pause for a</p> <p>22 second?</p> <p>23 MR. VOSS: Yes.</p> <p>24 MR. CRISP: I'm sure you want to</p> <p>25 follow up on it. Is this it?</p> </div>

<div> <div>Case 25-11354 JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc THE WITNESS Certification in Support of that. I don't know if you want me to answer. I have been told numbers. But I don't have firsthand knowledge of that.</div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> <div> <div>MR. CRISP: Salesforce.com, in case you want to know, gives you information on the platform and where it's headquartered and how you log in and so on. That's what I pulled up and that's what we had talked about. Yeah.</div> <div>MR. VOSS: Thank you.</div> <div>BY MR. VOSS:</div> <div>Q. We have gotten into a little bit. But I want to be a little bit more focused. Heller Capital. Can you describe to me what Heller Capital was as a business?</div> <div>A. Sure. So to the best of my understanding, we were a family holding company. You know, the public appearance of Heller Capital often would say that it was a boutique private equity firm but we didn't really function like private equity firms functioned. It was just Daryl Heller as kind of the primary owner purchasing entities that rolled up to a team that performed services for those entities.</div> <div>Q. Who were the owners of Heller Capital?</div> </div> </div>	<div> <div>45</div> <div>47</div> </div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> <div> <div>Q. What numbers were you told and by whom?</div> <div>A. I was told by Barry Rynearson that the K-1 issued to Heller Capital from Paramount Management in one of the years before all of this. So either 2022 or 2023 was 22 million. And that's an estimate.</div> <div>Q. Do you know how much money it made from PowerCoin?</div> <div>A. I do not have firsthand knowledge of that. But I also, I believe that it is -- it is none.</div> <div>Q. None?</div> <div>A. I believe.</div> <div>Q. Okay. Do you know who would have made money off of PowerCoin?</div> <div>A. So should I go into a lot of background here? I don't want to go into too much context.</div> <div>At some point in late 2024, I honest to Pete can't remember when. So an estimate would be August of 2024. The</div> </div>
<div> <div>46</div> </div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> <div> <div>A. So I, to my knowledge, to the best of my recollection, Daryl Heller was a 99 percent owner. And I do not remember who the one percent was.</div> <div>Q. Was it a person or an entity?</div> <div>A. I think it was an entity.</div> <div>Q. Was it a Daryl Heller-owned entity?</div> <div>A. Honest to Pete, I don't remember. I would -- probably in some form or fashion, yes.</div> <div>Q. Do you know who would know the answer to the one percent ownership stake?</div> <div>A. At this point, like as we speak today?</div> <div>Q. Yes, sir.</div> <div>A. It's most likely Josh Baker, Austin Quinones and Daryl Heller are the ones that I can think of that would probably know that.</div> <div>Q. Okay. How did Heller Capital make money?</div> <div>A. Distributions from its companies.</div> <div>Q. Nothing more than that?</div> <div>A. Nothing more than that.</div> <div>Q. Okay. Do you know how much it made from Paramount?</div> <div>A. So I do not have firsthand knowledge</div> </div>	<div> <div>48</div> </div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> <div> <div>executive team at PowerCoin resigned. And I was asked to go in there and try to hold things together as we kind of figured out what to do. And PowerCoin was deeply, deeply in debt at that time.</div> <div>Q. Who were they in debt to?</div> <div>A. To the best of my recollection, the organization was Chicago Atlantic.</div> <div>Q. Before it got to the point of what I'll call failure, what was PowerCoin making for Heller Capital?</div> <div>A. Again, to my knowledge, to my recollection and knowledge, I do not believe that PowerCoin ever paid distributions to Heller Capital.</div> <div>Q. Did it pay distributions to Paramount?</div> <div>A. I do not know.</div> <div>Q. Okay. Actually, falling back on something we talked about. You were looking for KPIs from Paramount. Do you know what a KPI from Paramount would have been? What would you have been looking for?</div> <div>A. So I don't honestly know. I mean that's why I was asking their chief operating office for a copy of their KPIs, which I was</div> </div>

<div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Certification in Support of KPIs of their own Page 786 of 810</div> <p>1 told that they had like <b>KPIs of their own</b></p> <p>2 <b>honestly don't know. I could wager a guess</b></p> <p>3 <b>based on PowerCoin's operations if you wanted</b></p> <p>4 <b>me to.</b></p> <p>5 Q. I'll take that guess, yes, sir.</p> <p>6 A. Okay. It would have been most likely</p> <p>7 machine up time or down time. So what</p> <p>8 percentage of the machines were operable at</p> <p>9 any given time. And then probably dollar</p> <p>10 volume per machine. Like how much like, you</p> <p>11 know, revenue is run into a machine. Based on</p> <p>12 a given period of time.</p> <p>13 Yeah, I mean those are the two</p> <p>14 ones that stick out in my head.</p> <p>15 Q. Thank you.</p> <p>16 Back to my sort of series of</p> <p>17 questions. BitStop. How did BitStop make</p> <p>18 money?</p> <p>19 A. So BitStop, to my knowledge, I don't</p> <p>20 know what I have written on here. 12.5</p> <p>21 percent. We were a very minority partner of</p> <p>22 BitStop. So we invested in them, actually,</p> <p>23 sort of as a partnership to PowerCoin.</p> <p>24 Although I, just to be clear, was not involved</p> <p>25 in that transaction. I really didn't know</p>	<div>51</div> <p>1 Q. Just Bitcoin or other</p> <p>2 cryptocurrencies?</p> <p>3 A. I don't know the answer to that.</p> <p>4 Q. But Bitcoin, at least?</p> <p>5 A. Bitcoin for sure, yes.</p> <p>6 Q. Did BitStop purchase Bitcoins, to your</p> <p>7 knowledge?</p> <p>8 A. I don't know.</p> <p>9 Q. How about PowerCoin? Did PowerCoin</p> <p>10 purchase Bitcoins?</p> <p>11 A. Yes. PowerCoin did need to purchase</p> <p>12 Bitcoin in order to operate.</p> <p>13 Q. And where did it purchase those from,</p> <p>14 if you know?</p> <p>15 A. I do know from my stint with them.</p> <p>16 They purchased it from -- I forget what they</p> <p>17 called it. It was like a brokerage that they</p> <p>18 had relationships with. During my time, we</p> <p>19 only used one and we referred to it as</p> <p>20 Stillman. I don't know the full legal name.</p> <p>21 Q. Stillman is a person or a business?</p> <p>22 A. I believe it was an entity. It was</p> <p>23 the brokerage that we were purchasing Bitcoin</p> <p>24 from.</p> <p>25 Q. And when you were last inside</p>
<div>50</div> <p>1 much about it until I got involved with</p> <p>2 PowerCoin itself.</p> <p>3 So my understanding, my best</p> <p>4 knowledge of BitStop is that it is a software</p> <p>5 provider for machines that sell crypto for</p> <p>6 automated teller type machines that sell</p> <p>7 cryptocurrency.</p> <p>8 Q. What was the relationship between</p> <p>9 PowerCoin and BitStop?</p> <p>10 A. My understanding, I never personally</p> <p>11 saw any contracts. But PowerCoin was using</p> <p>12 BitStop's software in their machines.</p> <p>13 Q. I see.</p> <p>14 Do you know if BitStop is still</p> <p>15 a going concern?</p> <p>16 A. To the best of my knowledge, yes, it</p> <p>17 is.</p> <p>18 Q. And how does BitStop make money?</p> <p>19 A. It's fees on the, to the best of my</p> <p>20 knowledge and understanding, it's the fees</p> <p>21 that they take on the transaction that their</p> <p>22 software transacts on machines.</p> <p>23 Q. And this is cryptocurrencies, you</p> <p>24 said?</p> <p>25 A. Yes, sir.</p>	<div>52</div> <p>1 PowerCoin, did it still hold any Bitcoins?</p> <p>2 A. To the best of my recollection, it did</p> <p>3 not.</p> <p>4 Q. Okay.</p> <p>5 A. It was, I mean if I can just put a</p> <p>6 little clarity out there. So it was</p> <p>7 purchasing the Bitcoin in order to sell</p> <p>8 through the kiosks to make a transaction fee</p> <p>9 on that.</p> <p>10 Q. I see.</p> <p>11 Do you know how Heller Capital</p> <p>12 makes money today?</p> <p>13 A. I do not.</p> <p>14 Q. Do you know how they were making money</p> <p>15 in December of 2024 when you were last there?</p> <p>16 A. I mean they were not really.</p> <p>17 Q. What do you mean by that?</p> <p>18 A. I know we're eventually going to get</p> <p>19 to this.</p> <p>20 So during, to the best of my</p> <p>21 have knowledge, during the period of time when</p> <p>22 I was functioning to kind of organize the</p> <p>23 accounting team, because the CFO had stepped</p> <p>24 away. And the director of finance was on</p> <p>25 maternity leave. We -- Heller Capital, excuse</p>

<div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc 53 1 me, was very much without money. So a lot of 2 loan payments weren't getting made. And it 3 was -- to my recollection, the only money that 4 was coming in seemed to be from external 5 loans. 6 Q. And why did Heller Capital suddenly 7 stop making money? 8 A. I can't answer that question. I don't 9 know. 10 Q. Okay. Who would know the answer to 11 that? 12 A. Daryl Heller. 13 Q. Anybody else? 14 A. I think from a historical context of 15 where the money was coming from, Barry 16 Rynearson would be the best person to ask 17 that. I really didn't know where funds came 18 from on a day-to-day basis. 19 Q. External loans you mentioned a minute 20 ago. Where was Heller Capital getting 21 external loans from? 22 A. So I don't know the names of the 23 creditors. What I know is our finance team 24 was seeing in various bank accounts deposits 25 come in and random names. Like, you know, on</div>	<div>55 1 Is that what you mean? 2 Q. That was my question. 3 A. To the best of my knowledge, Daryl 4 Heller was the only one doing it. In fact, at 5 that time, and I imagine you would see text 6 messages from me to that effect. We were 7 asking for loan documents because the finance 8 team didn't have enough information to know 9 when payments were supposed to be made or how 10 to book interest versus principal. I mean we 11 just -- he was leaving us in the dark. 12 Q. I see. 13 MR. VOSS: And to the extent I 14 have not called for those text messages 15 already, I'll call for them. 16 MR. CRISP: Yes. They will be 17 in the next e-mail file. But you can just use 18 a browser to open it up. And that's fine. 19 MR. VOSS: That will work. 20 Thank you, counsel. 21 BY MR. VOSS: 22 Q. What is the time period, the answer 23 you just gave, what time periods were you 24 talking about, these external loans coming in? 25 A. Sure. So I started to get involved,</div>
<div>54 1 the wire transfer, it would give a description 2 and it would have a random creditor name. 3 Q. I see. 4 And you weren't involved in the 5 discussions to initiate those loans? 6 A. No. 7 Q. Do you know who would have been 8 involved in those discussions? 9 A. My personal belief, to the best of my 10 knowledge, Daryl Heller was the only one doing 11 it. 12 MR. CRISP: Give me one second 13 here. 14 THE WITNESS: I'm so sorry. 15 Could you repeat the question? 16 MR. VOSS: I believe -- in fact, 17 what was my standing question? 18 (The previous question was read 19 back by the reporter.) 20 THE WITNESS: Okay. So just to 21 be clear. We're talking about external loans 22 and who would have been involved in 23 establishing those external loans? 24 BY MR. VOSS: 25 Q. Yes.</div>	<div>56 1 to the best of my recollection, after Dana 2 went on maternity leave. So it was May of 3 2024 I believe is when she had her baby. 4 Q. And at that time, that was the first 5 time you became aware that Heller Capital was 6 having financial struggles? 7 A. I don't think it was the first time I 8 became aware that there were financial 9 struggles. 10 Q. When do you think that was? 11 A. March of 2024. 12 Q. And what brought that to your 13 attention? 14 A. I think a couple of things. Barry -- 15 it was probably mostly from Barry. I mean he 16 was concerned about things. And then he, you 17 know, didn't communicate very well toward the 18 end of March. And then all of a sudden he 19 resigned, which was very concerning. 20 And then we had some whispers. 21 I heard some whispers through Dan Burkholder 22 that things were not getting paid for Prestige 23 which, you know, up until that point, I had -- 24 I mean Prestige and Paramount, for all intents 25 and purposes for the Heller Capital team, was</div>

<div>57</div> <div>Case 25-11354 JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Certification in Support of Motion for Summary Judgment Page 788 of 810</div> <p>1 on auto pilot. We didn't really think about 2 it. So I don't think anybody really knew what 3 that meant when we heard it. And then things 4 progressively got worse.</p> <p>5 <b>Q.</b> I see.</p> <p>6 At some point in 2024, was 7 Heller Capital effectively insolvent?</p> <p>8 <b>A.</b> Yeah. To the best of what I saw, yes.</p> <p>9 <b>Q.</b> When do you think that was?</p> <p>10 <b>A.</b> Honestly, so I mean by May. I mean 11 there were no debt payments being, like very 12 few debt payments were being made. To the 13 best of my recollection, very few debt 14 payments were being made. And it was a 15 struggle on a day-to-day basis.</p> <p>16 <b>Q.</b> To the extent Heller Capital was still 17 generating revenue at that time, where was the 18 revenue coming from?</p> <p>19 <b>A.</b> Yeah. Again, I don't think they were 20 really generating revenue. I do recall Daryl 21 was working to liquidate procurement, analysis 22 and strategy. I actually, I read the text 23 messages today. So it's fresh in my head.</p> <p>24 And they had a pretty 25 significant offer. I don't remember what it</p>	<div>59</div> <p>25 sense of the value of Paramount. But I had 2 more of a sense of the size of the investments 3 that had gone into Paramount than I had had in 4 the past.</p> <p>5 <b>Q.</b> Where did you learn that from?</p> <p>6 <b>A.</b> So when Barry Ryneearson left, there 7 was a simple spreadsheet that Matt Eby had 8 created for him that just showed how much 9 money Prestige had sent to Paramount. And it 10 was a very significant dollar value that 11 shocked me.</p> <p>12 <b>Q.</b> Why did it shock you?</p> <p>13 <b>A.</b> Because I -- I mean I knew Paramount 14 was operating but I just literally had no idea 15 that that much money had come into Paramount 16 or that Paramount had even operated at that 17 kind of monetary level.</p> <p>18 <b>Q.</b> Do you think Paramount was worth 19 \$450 million in the fall of 2024?</p> <p>20 <b>A.</b> I would honestly have no way of 21 knowing.</p> <p>22 <b>Q.</b> Okay. Do you know what Luma FG is?</p> <p>23 <b>A.</b> Yes.</p> <p>24 <b>Q.</b> What is Luma FG?</p> <p>25 <b>A.</b> It's a financial group that was</p>
<div>58</div> <p>1 is. But it actually is in the text messages. 2 And so some money from the sale 3 of that had come in. Again, to the best of my 4 recollection.</p> <p>5 <b>Q.</b> Did there ever come a time in the fall 6 of 2024 where you learned of a potential sale 7 of Paramount?</p> <p>8 <b>A.</b> So to the best of my recollection, 9 Daryl was very careful to never say that word, 10 a sale of Paramount. He implied that he was 11 thinking about doing that. But he never said 12 it.</p> <p>13 <b>Q.</b> Did he ever imply who he was thinking 14 about selling it to?</p> <p>15 <b>A.</b> Never.</p> <p>16 <b>Q.</b> Okay.</p> <p>17 <b>A.</b> To the best of my recollection.</p> <p>18 <b>Q.</b> Was there ever, to your knowledge, 19 advanced discussions on the actual sale of 20 Paramount?</p> <p>21 <b>A.</b> Not to -- to my recollection, none. 22 There was none.</p> <p>23 <b>Q.</b> Did you have a sense of the value of 24 Paramount in the fall of 2024?</p> <p>25 <b>A.</b> In the fall of 2024, I didn't have a</p>	<div>60</div> <p>1 established by Dana Schlicker and now Josh 2 Baker and Austin Quinones to provide financial 3 services to Heller Capital Group moving 4 forward.</p> <p>5 <b>Q.</b> To your knowledge, is Daryl Heller 6 involved in that?</p> <p>7 <b>A.</b> To my knowledge, he is not.</p> <p>8 <b>Q.</b> Okay. Have you ever heard of Althea 9 Management?</p> <p>10 <b>A.</b> I have.</p> <p>11 <b>Q.</b> Do you know what that is?</p> <p>12 <b>A.</b> To my recollection, yeah, it was a -- 13 it was going to be the same thing that Luma 14 was but owned by Daryl Heller.</p> <p>15 <b>Q.</b> The same question. Have you heard of 16 Althea Group?</p> <p>17 <b>A.</b> Oh, sorry. What was your first one?</p> <p>18 <b>Q.</b> The first one was Althea Management?</p> <p>19 <b>A.</b> I apologize. So I have heard of both 20 of them, yes.</p> <p>21 <b>Q.</b> What was the difference between them?</p> <p>22 <b>A.</b> I don't know.</p> <p>23 <b>Q.</b> Did they ever get going?</p> <p>24 <b>A.</b> I don't know.</p> <p>25 <b>Q.</b> Okay. How many entities -- I'll take</p>



<div> <div>61</div> <div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc</div> <div>an estimate here if you don't have an exact</div> <div>Certification in Support</div> <div>Page 789 of 810</div> </div> </div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> <div> <p>number.</p> <p>How many entities were under Heller Capital? In sort of a corporate flow chart, how many entities were under Heller Capital?</p> <p><b>A. Are you including like SPE lists, special purpose entities, that just held real estate?</b></p> <p><b>Q.</b> Yes.</p> <p><b>A. An estimate, I would give you, it would be somewhere in the realm of 130 to 140.</b></p> <p><b>Q.</b> Do you think that's still true today?</p> <p><b>A. I really don't know.</b></p> <p><b>Q.</b> Okay. In the 130 to 140, what period of time would that have been when it's at its zenith, 140, what month and year would that have been?</p> <p><b>A. I mean I would say late 2024.</b></p> <p><b>Q.</b> Okay. Did you start to see that number go down in your last year there?</p> <p><b>A. I didn't. But I also wasn't monitoring that.</b></p> <p><b>Q.</b> Okay. Are there any entities over Heller Capital?</p> </div>	<div> <div>63</div> <div> <div>25</div> <div> <div>Entered 04/25/25 14:39:18 Desc</div> <div>clearly because I think it would be a</div> <div>Page 789 of 810</div> </div> </div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> <div> <p>disingenuous answer if we said a 12-month period. So there wouldn't have been a 12-month time period where there would have been the same role.</p> <p>THE WITNESS: Yes. So I would probably, the best period to narrow it down to would be from May to December of 2024.</p> <p>BY MR. VOSS:</p> <p><b>Q.</b> That would be great. Describe your role during that time period. That would be great.</p> <p><b>A. Sure. So I was still performing operational responsibilities at some of the companies. So I held, you know, regular meetings with their management team just talking about the operational, operations of their companies.</b></p> <p>And Dana Schlicker had went on maternity leave in May. So in order for the finance team to kind of work to Daryl, I mean it really needed to be kind of just related throughput that there was one source of messaging. Otherwise, it would have gotten a little chaotic. So I basically received from</p> </div> </div>
<div> <div>62</div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> <div> <p><b>A. To the best of my knowledge, no.</b></p> <p><b>Q.</b> What is the relationship between Heller Capital and Heller Investment Holdings?</p> <p><b>A. To the best of my knowledge, they are owned by the same person would be the relationship.</b></p> <p><b>Q.</b> And that person is Daryl Heller?</p> <p><b>A. Yes.</b></p> <p><b>Q.</b> Does Heller Capital own Heller Investment Holdings?</p> <p><b>A. To the best of my recollection, it does not.</b></p> <p><b>Q.</b> No. So they're more like maybe sister organizations?</p> <p><b>A. Yes.</b></p> <p><b>Q.</b> I think we covered this. But just so I make sure it was asked.</p> <p>What was your general role at Heller Capital?</p> <p><b>A. During which period of time?</b></p> <p><b>Q.</b> Let's go with the last 12 months?</p> <p><b>A. The last 12 months of my employment there --</b></p> <p>MR. CRISP: So I would like you to narrow that into blocks of time to be</p> </div> </div>	<div> <div>64</div> <div> <div>1</div> <div>2</div> <div>3</div> <div>4</div> <div>5</div> <div>6</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div> </div> <div> <p>the finance team information about cash needs and loan payments that needed to be made, relayed those to Daryl. Daryl told us, you know, he would say, money was coming in to a certain account. He would never give why or where that money was coming from. And he would tell us where to send that money when it came in.</p> <p><b>Q.</b> Okay. And let's do January to May of 2024. What was --</p> <p><b>A. So, you know, to the best of my recollection, I was serving in the operations capacity. So it was, you know, work with companies to, you know, help boost profits or, you know, streamline processes or whatever that would be.</b></p> <p><b>Q.</b> A couple questions about Paramount to the extent you know.</p> <p>Do you think Paramount was undercapitalized?</p> <p><b>A. I don't know.</b></p> <p><b>Q.</b> Do you know if Paramount observed its corporate form? Were there board meetings or regular meetings of the members, those sort of things? Do you have any awareness of that?</p> </div> </div>

<div>65</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 790 of 810</div> <div>1 <b>A. I do not know.</b></div> <div>2 <b>Q.</b> Okay. Do you believe or do you know</div> <div>3 if Paramount's affairs were kept separate from</div> <div>4 Heller Capital?</div> <div>5 <b>A. To the best of my knowledge, yes, they</b></div> <div>6 <b>were kept very separate.</b></div> <div>7 <b>Q.</b> Okay. All right. Let's talk about</div> <div>8 Paramount. We have touched on it several</div> <div>9 times.</div> <div>10 I take it you're familiar with</div> <div>11 Paramount?</div> <div>12 <b>A. Yes.</b></div> <div>13 <b>Q.</b> Okay. Can you describe for me what</div> <div>14 you think Paramount did?</div> <div>15 <b>A. Yeah. My understanding of what</b></div> <div>16 <b>Paramount did was managed ATM machines.</b></div> <div>17 <b>Q.</b> Okay. Are you aware of any of the</div> <div>18 assets of Paramount at any time, physical</div> <div>19 assets?</div> <div>20 <b>A. I'm not a hundred percent sure that</b></div> <div>21 <b>this is what I'm about to relay to you. But</b></div> <div>22 <b>at a point in time, and I would, best</b></div> <div>23 <b>estimation would be in 2022, Daryl Heller</b></div> <div>24 <b>asked me if -- I functioned in an IT capacity</b></div> <div>25 <b>in some form or fashion for Daryl. And so he</b></div>	<div>67</div> <div>1 <b>A. I am.</b></div> <div>2 <b>Q.</b> Can you tell me about those?</div> <div>3 <b>A. So I -- the only three that I can say</b></div> <div>4 <b>that I know about were -- and this is to the</b></div> <div>5 <b>best of my recollection. I believe there was</b></div> <div>6 <b>a Porsche. And the reason I even know this is</b></div> <div>7 <b>because I dealt with insurance policies for</b></div> <div>8 <b>some of these cars. So I believe there was a</b></div> <div>9 <b>Porsche. I believe there was a BMW X5 and I</b></div> <div>10 <b>believe that there was a Chevy Tahoe.</b></div> <div>11 <b>Q.</b> Okay. Do you know what those cars</div> <div>12 were used for?</div> <div>13 <b>A. I mean I, to the best of my</b></div> <div>14 <b>understanding, the Porsche was Daryl's</b></div> <div>15 <b>personal car and the Tahoe was Dennis Ream's</b></div> <div>16 <b>vehicle. But I honestly, I'm not a hundred</b></div> <div>17 <b>percent sure.</b></div> <div>18 <b>Q.</b> Does that strike you as a reasonable</div> <div>19 business expense?</div> <div>20 MR. CRISP: Objection to that.</div> <div>21 I don't know if he is really in a position to</div> <div>22 know.</div> <div>23 MR. VOSS: Fair enough.</div> <div>24 BY MR. VOSS:</div> <div>25 <b>Q.</b> Were you aware at some point in time</div>
<div>66</div> <div>1 <b>asked me if it was possible to take an Excel</b></div> <div>2 <b>document and limit anybody's ability to edit</b></div> <div>3 <b>or download it. And I said, yes. And he sent</b></div> <div>4 <b>me that Excel document.</b></div> <div>5 And to the best of my knowledge</div> <div>6 and recollection, that Excel document had</div> <div>7 addresses and serial numbers. And I put it on</div> <div>8 OneDrive and limited the access and sent him a</div> <div>9 link back to send to whoever he ended up</div> <div>10 sending it to.</div> <div>11 So that is the only time I</div> <div>12 recall seeing any kind of list. And I</div> <div>13 don't -- I'm not even 100 percent sure that's</div> <div>14 what it was. But that's what I thought it was</div> <div>15 at the time in all fairness.</div> <div>16 <b>Q.</b> And you thought it was ATMs on there?</div> <div>17 <b>A. Yeah, that's what I thought it was.</b></div> <div>18 <b>Q.</b> Okay. That OneDrive, that is a</div> <div>19 OneDrive at Heller Capital?</div> <div>20 <b>A. Um-hmm.</b></div> <div>21 <b>Q.</b> You don't have a copy of that</div> <div>22 spreadsheet?</div> <div>23 <b>A. I don't.</b></div> <div>24 <b>Q.</b> Are you familiar with any cars that</div> <div>25 Paramount owned from time to time?</div>	<div>68</div> <div>1 that Paramount owned a corporate Ferrari?</div> <div>2 <b>A. I was not aware of that.</b></div> <div>3 <b>Q.</b> Okay. How about bank accounts of</div> <div>4 Paramount? Did you ever have access to the</div> <div>5 bank accounts?</div> <div>6 <b>A. To the best of my recollection, I</b></div> <div>7 <b>never had access to any Paramount bank</b></div> <div>8 <b>accounts.</b></div> <div>9 <b>Q.</b> Okay. Are you familiar generally with</div> <div>10 payments to Heller Capital from Paramount?</div> <div>11 <b>A. To the best of my recollection, I</b></div> <div>12 <b>would say, unfortunately, I have to break this</b></div> <div>13 <b>into periods of time.</b></div> <div>14 In the very early days when I</div> <div>15 was really functioning for Glorious only, I do</div> <div>16 remember, recall, that, you know, Paramount</div> <div>17 was sending money into Heller Capital to fund</div> <div>18 some of Glorious' activities.</div> <div>19 There is a middle period of time</div> <div>20 where I really wouldn't have seen or heard</div> <div>21 anything about those except I have a text</div> <div>22 message from Barry Rynearson that specifically</div> <div>23 said that Paramount was sending money for</div> <div>24 something I was working on, which was a</div> <div>25 project we were launching for a down payment.</div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc</div> <div>And that was from -- It is so Certification in Support Page 791 of 810</div> </div> <div> <p>1 hard to give estimate dates. But that would</p> <p>2 have been from mid 2021 to like 20 -- the end</p> <p>3 of 2023. That I just really didn't have any</p> <p>4 knowledge of that.</p> <p>5 And then in 2024, during the</p> <p>6 period where Dana was on maternity leave, I do</p> <p>7 know that a few payments were sent to Heller</p> <p>8 Capital from Paramount.</p> <p>9 Q. How many and for how much?</p> <p>10 A. I'm so sorry, I don't remember. I did</p> <p>11 read them today. But I honest to God don't</p> <p>12 remember.</p> <p>13 Q. More or less than a million dollars in</p> <p>14 total?</p> <p>15 A. To the best of my recollection, it was</p> <p>16 less than a million dollars.</p> <p>17 Q. Do you recall, if you can't remember</p> <p>18 the month, the quarter that they would have</p> <p>19 been sent, first, second, third, fourth</p> <p>20 quarter of 2024?</p> <p>21 A. To the best I could honestly do is</p> <p>22 tell you it would have been between. The ones</p> <p>23 that I am aware of, just to be clear, it would</p> <p>24 have been between May of 2024 and probably</p> <p>25</p> </div>	<div> <div>71</div> <div>company, I think shorthand is just known as</div> </div> <div> <p>1 Raw? Are you familiar with that?</p> <p>2 A. Yes.</p> <p>3 Q. What is Raw?</p> <p>4 A. So to the best of my knowledge, it was</p> <p>5 a line of credit facility that Paramount had</p> <p>6 created to loan money to the various entities.</p> <p>7 Q. Do you know the full name of the</p> <p>8 entity?</p> <p>9 A. I don't. Can I give an estimate, a</p> <p>10 thought of what it might be?</p> <p>11 Q. Yes.</p> <p>12 A. I remember hearing Raw Ventures, LLC.</p> <p>13 R-a-w, LLC. But I don't know if we're talking</p> <p>14 about the same thing or if that's the real</p> <p>15 name.</p> <p>16 Q. That we can figure out.</p> <p>17 Do you know, is Raw an acronym</p> <p>18 for something?</p> <p>19 A. I don't know.</p> <p>20 Q. Okay. Do you know if Raw owed money</p> <p>21 to Paramount?</p> <p>22 A. I don't know.</p> <p>23 Q. Do you know how much money Paramount</p> <p>24 loaned to Raw?</p> <p>25</p> </div>
<div> <div>70</div> </div> <div> <p>1 July of 2024 until Dana Schlicker came back</p> <p>2 from maternity leave.</p> <p>3 Q. I see.</p> <p>4 And did somebody tell you what</p> <p>5 those payments were for?</p> <p>6 A. No. So I explained that the financing</p> <p>7 was telling us how much money they needed and</p> <p>8 I was telling Daryl that they needed that</p> <p>9 money and then Daryl would just say, hey, I</p> <p>10 have a hundred thousand dollars coming from,</p> <p>11 again, that's a rhetorical whatever, a hundred</p> <p>12 thousand dollars coming from Paramount and,</p> <p>13 you know, pay this and this and this.</p> <p>14 Q. So it was using Paramount to fund</p> <p>15 Heller Capital needs?</p> <p>16 A. To the best of my recollection, yes.</p> <p>17 Q. Do you know if Heller Capital had a</p> <p>18 receivable owed to Paramount?</p> <p>19 A. If Heller Capital had a receivable</p> <p>20 owed to Paramount? In other words, if Heller</p> <p>21 Capital owed money just directly to Paramount?</p> <p>22 Q. Correct.</p> <p>23 A. I, unfortunately, do not know the</p> <p>24 answer to that.</p> <p>25 Q. How about, are you familiar with the</p> </div>	<div> <div>72</div> </div> <div> <p>1 A. I don't know.</p> <p>2 Q. Do you have a sense of the scale of</p> <p>3 it?</p> <p>4 A. So I don't have a sense of the scale</p> <p>5 of what Paramount loaned to Raw. But I have a</p> <p>6 sense -- I have an idea of what I believe</p> <p>7 Glorious owed to Raw, which I don't know if</p> <p>8 the only funder to Raw was Paramount is my --</p> <p>9 is the reason I don't.</p> <p>10 So in an estimate, I've heard</p> <p>11 the number 16 million.</p> <p>12 Q. Glorious owed Raw 16 million?</p> <p>13 A. I've heard that, yes.</p> <p>14 Q. As of --</p> <p>15 A. Oh, man. You with the dates. You're</p> <p>16 killing me.</p> <p>17 As of the last time I would have</p> <p>18 heard that would have probably been --</p> <p>19 MR. CRISP: Do you have a season</p> <p>20 in a year, if you can?</p> <p>21 THE WITNESS: Yeah, it would</p> <p>22 have been summer of 2024.</p> <p>23 BY MR. VOSS:</p> <p>24 Q. You said you heard that. Who did you</p> <p>25 hear it from?</p> </div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc</div> <div>73</div> <div> <div>1 A. I believe -- I believe I heard it from</div> <div>2 Erin Farabaugh.</div> <div>3 Q. The corporate counsel?</div> <div>4 A. Yes.</div> <div>5 Q. Do you know if she still works for</div> <div>6 Heller Capital?</div> <div>7 A. She does not.</div> <div>8 Q. Are you aware if PowerCoin owed</div> <div>9 Paramount money?</div> <div>10 A. I am not. To the best of my</div> <div>11 recollection, I am not aware of that.</div> <div>12 Q. Are you aware of any loans that Heller</div> <div>13 Capital made to Paramount in 2024? So from</div> <div>14 Heller Capital to Paramount in 2024?</div> <div>15 A. During that same period of time when I</div> <div>16 was dealing with payments, money was sent back</div> <div>17 to Paramount multiple times.</div> <div>18 Q. And what was that money for?</div> <div>19 A. I don't know. To the best of my</div> <div>20 recollection, I was not given any reason for</div> <div>21 the money being sent there.</div> <div>22 Q. Who told you to send it?</div> <div>23 A. Daryl Heller.</div> <div>24 Q. And you said the money was sent. It</div> <div>25 was sent by you?</div> </div> </div>	<div> <div>75</div> <div> <div>1 A. He didn't. But, yeah, he didn't. I</div> <div>2 was going to go off into a reason that it</div> <div>3 didn't really matter.</div> <div>4 Q. I'll take the reason why it didn't</div> <div>5 matter.</div> <div>6 A. You know, there were a lot of times</div> <div>7 you're under a date or something that we just</div> <div>8 want to lock data down. So we didn't have</div> <div>9 like a formal data vault. So I didn't know</div> <div>10 what he was doing. So that was not a super</div> <div>11 unusual request, I guess.</div> <div>12 Q. I see.</div> <div>13 Are you aware of Heller Capital</div> <div>14 removing operating revenue from Paramount in</div> <div>15 the second quarter of 2024?</div> <div>16 A. So I just want to clarify that I heard</div> <div>17 your question right. Am I aware of Heller</div> <div>18 Capital removing operating entity, or</div> <div>19 operating revenue, excuse me, from Paramount</div> <div>20 in the second quarter of 2024?</div> <div>21 Q. Correct.</div> <div>22 A. Other than, because it was second</div> <div>23 quarter was part of that timeframe I told you.</div> <div>24 Other than the few payments that came in from</div> <div>25</div> </div> </div>
<div> <div>74</div> <div> <div>1 A. It was sent by one of the finance</div> <div>2 members.</div> <div>3 Q. But at your direction?</div> <div>4 A. Yes.</div> <div>5 Q. On Daryl's --</div> <div>6 A. From a request from Daryl to the</div> <div>7 financing.</div> <div>8 MR. CRISP: To be clear. I</div> <div>9 think none of these financial transactions</div> <div>10 were ever initiated absent the direction from</div> <div>11 Daryl.</div> <div>12 MR. VOSS: That is an important</div> <div>13 clarification. I appreciate that, counsel.</div> <div>14 THE WITNESS: Yeah.</div> <div>15 BY MR. VOSS:</div> <div>16 Q. Were you ever aware of the ATM count</div> <div>17 at Paramount, how many ATMs they had under</div> <div>18 management?</div> <div>19 A. I was not.</div> <div>20 Q. At no point in time?</div> <div>21 A. I was not. Again, I mean other than</div> <div>22 that document that I had sent, I had never</div> <div>23 seen anything related to ATMs or serial</div> <div>24 numbers or addresses.</div> <div>25 Q. Did he tell you why he needed that</div> </div> </div>	<div> <div>76</div> <div> <div>1 Paramount, I'm not aware of any more than</div> <div>2 that.</div> <div>3 Q. And these are the payments we referred</div> <div>4 to before that you estimated were under a</div> <div>5 million dollars?</div> <div>6 A. Yes.</div> <div>7 Q. If I told you that Dennis Ream has</div> <div>8 testified under oath that Heller moved</div> <div>9 operating revenue in quarter two, would that</div> <div>10 surprise you that that happened?</div> <div>11 A. Yeah. I mean I guess to what extent</div> <div>12 was operating revenue removed?</div> <div>13 Q. Well, that's what we're trying to get</div> <div>14 to the bottom of. That's another question to</div> <div>15 you. If you're aware of it. It sounds like,</div> <div>16 no.</div> <div>17 Why would it surprise you if</div> <div>18 operating revenue had been removed?</div> <div>19 A. I mean when you say Heller Capital</div> <div>20 removed it, I guess it would surprise me</div> <div>21 because we didn't see it come into any --</div> <div>22 well, at least the finance team that was</div> <div>23 telling what was happening in the bank</div> <div>24 accounts didn't see it come in.</div> <div>25 Q. Fair point. Bad question.</div> </div> </div>

<div> <div>77</div> <div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc</div> <div>Would it surprise you that Daryl Heller removed operating revenue from Paramount?</div> <div> <div>A. Would it surprise me? No.</div> <div>Q. Okay. Why not?</div> <div>A. He, unfortunately, Daryl moved money around a lot in his, yeah, in his day-to-day. So it doesn't, you know, wouldn't shock me necessarily.</div> <div>Q. When you say he moved revenue around a lot, do you mean between the 140 or so entities?</div> <div>A. Yeah. Yes.</div> <div>Q. Did he give explanations for why he was moving the money around?</div> <div>A. Not typically, no.</div> <div>Q. Okay. Was there sort of an accounting description given for those moves on the general ledger or the P&amp;L or whatever transaction they were recorded in, or document?</div> <div>A. I'm frankly not aware. They would be -- I believe, and to the best of my knowledge, they would be documented as do tos and do froms to various portfolio companies.</div> </div> </div> </div>	<div> <div>79</div> <div> <div>request sums of money every month.</div> <div>I mean, again, I'm operating in a limited scope. The finance team would have seen it from a larger perspective. But even during that short period of time, yeah, he requested funds for things.</div> <div>Q. AMEX bills, what did they typically go for, amounts?</div> <div>A. So my understanding was about a hundred thousand dollars a month. During that period of time, the corporate AMEX ballooned pretty significantly. He had put some, to the best of my understanding and knowledge, he had put some loan payments on them, which were getting hit pretty hard, and they had gotten up to about three hundred thousand.</div> <div>Q. Per month?</div> <div>A. I just know the balance of the statement was three hundred thousand-ish.</div> <div>Q. So not necessarily paid off every month?</div> <div>A. Yeah.</div> <div>Q. It was a rolling balance?</div> <div>A. Yeah.</div> <div>Q. I see.</div> </div> </div>
<div> <div>78</div> <div> <div>Q. I see.</div> <div>And only Daryl Heller would have had line of sight on the do to/do from obligations?</div> <div>A. No. They would sit on the balance sheets. So the finance teams would have seen those. But, again, it depends on which entities they had access to.</div> <div>Q. I see.</div> <div>Do you know why Paramount failed?</div> <div>A. I don't.</div> <div>Q. Do you have any guesses?</div> <div>A. Honestly, I don't.</div> <div>Q. Are you aware of any payments directly from Paramount to Daryl Heller?</div> <div>A. I'm not.</div> <div>Q. How about from Heller Capital directly to Daryl Heller?</div> <div>A. Yeah. To the best of my recollection, yes.</div> <div>Q. What were those payments for?</div> <div>A. I mean he got his guaranteed payments and then, yeah, he would request funds to, you know, pay his AMEX bill or, yeah, he would</div> </div> </div>	<div> <div>80</div> <div> <div>What period of time was this?</div> <div>A. That was during that May to July timeframe when I was dealing with some financial transactions.</div> <div>Q. And to be clear, May and July of 2024?</div> <div>A. 2024, yes.</div> <div>Q. Did the AMEX he was asking to get paid off from time to time, how far back historically did that go?</div> <div>A. I don't know. I honestly don't know.</div> <div>Q. Okay. And that was his personal AMEX or a corporate AMEX?</div> <div>A. His personal one. The corporate one was managed by the finance team, I believe.</div> <div>Q. I see.</div> <div>Did he provide statements for these, his personal AMEX?</div> <div>A. I don't know.</div> <div>Q. Okay. Do you know who would know that?</div> <div>A. There is probably two people that might have visibility or line of sight on the statements. Rose Kohl, his assistant. And probably Dana Schlicker just in her capacity as director of finance. But I don't -- I</div> </div> </div>

<div> <div>81</div> <div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc</div> <div> <div>1 actually don't think Dana probably saw his</div> <div>2 statements, personal statements.</div> <div>3 Q. Are you familiar with anybody he used</div> <div>4 his personal AMEX on?</div> <div>5 MR. CRISP: Meaning what did he</div> <div>6 spend it on? What did he spend stuff --</div> <div>7 MR. VOSS: Yeah.</div> <div>8 BY MR. VOSS:</div> <div>9 Q. Who he bought stuff for?</div> <div>10 A. No.</div> <div>11 Q. Okay.</div> <div>12 A. I'm afraid I'm not. To the best of my</div> <div>13 recollection. Sorry. I'm not supposed to say</div> <div>14 things like that.</div> <div>15 Q. I can give you some acronyms without</div> <div>16 context. So do your best with them.</div> <div>17 Do you know what PQI would be as</div> <div>18 a shorthand for an entity within the Heller</div> <div>19 universe of entities, PQI? Any guess what</div> <div>20 that would refer to?</div> <div>21 A. To the best of my recollection, I</div> <div>22 don't know that one.</div> <div>23 Q. Could it be PowerQuest?</div> <div>24 A. Oh, okay.</div> <div>25 Q. How about FR? Any idea what that</div> </div> </div> </div>	<div> <div>83</div> <div> <div>62 Understood.</div> <div>2 Q. When was the last time you talked to</div> <div>3 Daryl Heller?</div> <div>4 A. Other than the e-mail exchange about</div> <div>5 payment of my attorney fees, probably January</div> <div>6 of 2025.</div> <div>7 Q. What was the context in which you</div> <div>8 talked to him?</div> <div>9 A. I mean we were still cleaning up a</div> <div>10 list of items that I had left. I was still,</div> <div>11 you know, kind of pushing him to do some of</div> <div>12 those. And I did a small consulting project</div> <div>13 that actually, similar to this, but it was</div> <div>14 just structuring something for his attorneys.</div> <div>15 Structuring some data in this format.</div> <div>16 Q. Did you ever discuss the losses with</div> <div>17 Daryl, the financial losses?</div> <div>18 A. Can you clarify which financial losses</div> <div>19 you're talking about?</div> <div>20 Q. So let's start with Paramount. Did</div> <div>21 you ever discuss the Paramount financial</div> <div>22 losses with him?</div> <div>23 A. So I mean to be clear, I don't -- to</div> <div>24 the best of my recollection, I didn't really</div> <div>25 know Paramount had financial losses. All I</div> </div> </div>
<div> <div>82</div> <div> <div>1 would be?</div> <div>2 A. So I know where you're going. Yeah.</div> <div>3 So that one would be First Regents, I believe.</div> <div>4 Q. What about PCI, C as in Charlie, PCI,</div> <div>5 any idea what that would be a shorthand for?</div> <div>6 A. I really -- I don't know.</div> <div>7 Q. Okay. How about Ultpay/JC? Any idea</div> <div>8 what that would be?</div> <div>9 A. I've heard of Ultpay but I have no</div> <div>10 idea what it is.</div> <div>11 Q. How about JC? Does that mean anything</div> <div>12 to you?</div> <div>13 A. Unfortunately, it does not.</div> <div>14 Q. Do you know what Ultpay was?</div> <div>15 A. I don't.</div> <div>16 Q. Anything to do with ATMs?</div> <div>17 A. I legitimately don't know.</div> <div>18 Q. PC. Did Daryl use that within the</div> <div>19 context of talking about Paramount? What do</div> <div>20 you think PC would be?</div> <div>21 A. I imagine it was PowerCoin.</div> <div>22 Q. Any difference between PC and PCI?</div> <div>23 A. I've never heard PCI.</div> <div>24 Q. Okay. Me neither. That's why I'm</div> <div>25 asking you.</div> </div> </div>	<div> <div>84</div> <div> <div>1 really understood was that Prestige was not</div> <div>2 being paid. And I didn't know why. And I</div> <div>3 mean I did ask like what's going on. And</div> <div>4 didn't get a good answer. Other than at that</div> <div>5 time he was just saying, we're going to buy it</div> <div>6 out and then it will clean up the whole thing.</div> <div>7 Q. You said at that time. What time was</div> <div>8 that?</div> <div>9 A. I mean that probably would have been</div> <div>10 during the period. To the best of my</div> <div>11 recollection, it was in that period of May.</div> <div>12 But then it probably extended on. Because,</div> <div>13 you know, I didn't really leave until</div> <div>14 December. So really from May of 2024 to</div> <div>15 December of 2024.</div> <div>16 Q. Did you ever discuss losses at Heller</div> <div>17 Capital?</div> <div>18 A. Yeah. I mean I was asking like what</div> <div>19 was going on with the loan payments. And, you</div> <div>20 know, his, to the best of my recollection, his</div> <div>21 response was that, you know, he basically</div> <div>22 couldn't put money in from Paramount because</div> <div>23 it had to be distributed equally to the</div> <div>24 investors. So that the buyout would be enough</div> <div>25 money for Heller Capital that it would pay off</div> </div> </div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc</div> <div>the loans that we were missing is basically what he told me. It was all contingent upon the buyout.</div> <div>Q. So I don't think I'm clear on your answer.</div> <div>The losses that you discussed at Heller Capital he said were the result of Paramount? Am I oversimplifying your answer? I'm sorry.</div> <div>A. Yeah. You are right. I mean the most of the -- so let me clarify.</div> <div>Most of the loan payments that we weren't making were in Cash Ventures and Blackford Funds, which I don't -- I didn't really have anything to do with Cash Ventures or Blackford Funds. But to the best of my knowledge, they were structured similarly to Prestige Funds except it wasn't outside investors, it was loans that Daryl had essentially taken for those entities to send in to Paramount to buy ATMs. So those loan payments were not being made.</div> <div>So when I was requesting like, hey, you're not paying your loans, like what's going on, like how are we going to get those</div> </div>	<div> <div>85</div> <div>25 Entered 04/25/25 14:39:18 Desc</div> <div>Page 795 of 810</div> <div>Q. I see. What time period was this?</div> <div>A. Again, those loan payments, to the best of my recollection, stopped getting made in, you know, early 2024.</div> <div>Q. Is one of those loans with Silverview Credit Partners?</div> <div>A. Yes.</div> <div>Q. Any others that you know of?</div> <div>A. I really don't. Let me clarify that question, actually.</div> <div>To the best of my knowledge, it was a couple of local banks. I do remember Cash Ventures had one with Mid Penn Bank, I think. But I don't remember the other ones.</div> <div>Q. Okay. Any idea where all the money went that the Prestige Fund Investors invested in Paramount?</div> <div>A. To the best of my recollection, I do not.</div> <div>Q. Are you familiar with the Prestige Funds at all?</div> <div>A. Umm, familiar in what way?</div> <div>Q. What is your understanding of what Prestige Investment Group was and what it did</div> </div>
<div> <div>86</div> <div>1 paid, he was basically saying that Paramount is not paying out any of their investors and that they were going to do the buyout and that would take those loans out.</div> <div>Does that make sense?</div> <div>Q. Yes.</div> <div>A. Sorry.</div> <div>Q. So you're saying he used loans that Blackford took out to make payments to investors within Paramount?</div> <div>A. No. I'm sorry.</div> <div>Q. That may not be what you said.</div> <div>MR. CRISP: Payments to buy assets for the underlying entity.</div> <div>THE WITNESS: So he was taking loans out on Blackford and Cash Ventures, okay, to buy assets through Paramount. Like my understanding is how Prestige functioned. But he was doing it through loans instead of raising capital to buy assets through Paramount.</div> <div>And so those loan payments were made by the distributions that were coming in month to month from Paramount to pay those loan payments.</div> </div>	<div> <div>88</div> <div>1 with Paramount?</div> <div>A. Yeah. So my rudimentary understanding probably before 2024 was investors put money in that bought ATMs through Paramount and then they got a return for a period of time on those ATMs. So that was my understanding of Prestige.</div> <div>Sorry. What was your core question? I apologize.</div> <div>Q. I just wanted to sort of set a base before I asked you any further questions if you even knew what Prestige was and did?</div> <div>A. Sure.</div> <div>Q. Did you ever have access to the amount of money, when I say access, documentation, did you ever see how much money had been invested by the investors with Paramount?</div> <div>A. So after Barry resigned, I think I told you there was an Excel spreadsheet that Matt had given to him. Matt Eby at Prestige had given to him that did show like a year-to-year investment from Prestige to Paramount.</div> <div>Q. Okay. That is the first time you ever saw anything showing amounts invested with Paramount?</div> </div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Certification in Support of the Paramount has today? Paramount. Page 796 of 810</div> <div> <div>89</div> <div>1 A. To the best of my recollection, yes.</div> <div>2 Q. Did you ever see anything subsequent,</div> <div>3 anything else?</div> <div>4 A. Yeah. So when Daryl was doing the</div> <div>5 buyout, when he was trying to put together the</div> <div>6 buyout, which, you know, I didn't, you know,</div> <div>7 he came to me and told me he needed -- I don't</div> <div>8 think he called it an election. Like a voting</div> <div>9 software. So that the investors of Prestige</div> <div>10 could vote.</div> <div>11 I, again, functioned as his IT</div> <div>12 person. Like I generally was that person. He</div> <div>13 just came to me and he basically said I need a</div> <div>14 secure platform that everybody gets, you know,</div> <div>15 whatever number of votes that they need or</div> <div>16 however they are weighted or whatever that</div> <div>17 was.</div> <div>18 So at that time Matt Eby shared</div> <div>19 with me lists of investors.</div> <div>20 Q. Okay. Just a couple more questions,</div> <div>21 actually. I'm almost done.</div> <div>22 I want to talk to you about</div> <div>23 crypto assets. Are you aware of any crypto</div> <div>24 assets that Heller Capital owned in the past?</div> <div>25 A. Other than indirect ownership through</div> </div> </div>	<div> <div>91</div> <div>1 A. Exclusively to Paramount?</div> <div>2 Q. Correct.</div> <div>3 A. I do not believe I'm aware of any</div> <div>4 assets Paramount has.</div> <div>5 Q. How about Heller Capital?</div> <div>6 A. So I don't -- I was not involved in</div> <div>7 the purchase of them. So I don't know. But I</div> <div>8 know -- but I do think, like there are land</div> <div>9 assets. Outside of obviously company assets,</div> <div>10 there are land assets. But I don't know if</div> <div>11 they were owned personally by Daryl Heller or</div> <div>12 Heller Capital.</div> <div>13 Q. Do you know where those land assets</div> <div>14 are?</div> <div>15 A. Yeah. Pennsylvania and New York.</div> <div>16 It's one large set of properties that spans</div> <div>17 both Pennsylvania and New York. And the last</div> <div>18 time somebody told me a number, it was</div> <div>19 somewhere in the realm of two thousand plus</div> <div>20 acres.</div> <div>21 And then, if I wasn't sitting in</div> <div>22 this room it wouldn't be escaping my brain.</div> <div>23 But somewhere down in the middle of the</div> <div>24 country. I'm so sorry. I can't at this time</div> <div>25</div> </div>
<div> <div>90</div> <div>1 PowerCoin as they were purchasing for</div> <div>2 liquidity to service their machines, I am not</div> <div>3 aware of, to the best of my recollection, I am</div> <div>4 not aware of any other crypto assets.</div> <div>5 Q. And by crypto assets, I don't want to</div> <div>6 just say Bitcoin. But mostly I'd like to know</div> <div>7 about Bitcoin. But to the extent there are</div> <div>8 any other cryptocurrencies purchased, my</div> <div>9 questions cover them all. Just to orient your</div> <div>10 thinking. Bitcoin and the like.</div> <div>11 How about crypto assets of</div> <div>12 Paramount? Are you aware of Paramount</div> <div>13 purchasing crypto assets?</div> <div>14 A. To the best of my recollection, I am</div> <div>15 not.</div> <div>16 Q. How about Daryl Heller personally?</div> <div>17 A. To the best of my recollection, I am</div> <div>18 not.</div> <div>19 Q. How about any Heller Capital entities,</div> <div>20 the 140 entities we mentioned that are in the</div> <div>21 sort of corporate soup, are there any of those</div> <div>22 that purchased crypto assets?</div> <div>23 A. To the best of my recollection, no. I</div> <div>24 don't think so.</div> <div>25 Q. Okay. Are you aware of any assets</div> </div>	<div> <div>92</div> <div>1 remember them all.</div> <div>2 Q. If I said Kansas, would that jog your</div> <div>3 recollection?</div> <div>4 A. Kansas. I think that's right, yes.</div> <div>5 Q. Do you know why so much acreage was</div> <div>6 purchased in Pennsylvania and New York?</div> <div>7 A. My understanding at the time was he is</div> <div>8 a hunter and he enjoyed hunting land.</div> <div>9 Q. Two thousand acres is a lot of</div> <div>10 hunting.</div> <div>11 A. Two thousand acres is a lot of</div> <div>12 hunting.</div> <div>13 Q. Did you ever hear anything about</div> <div>14 assets in the Caribbean?</div> <div>15 A. No.</div> <div>16 Q. The Cayman Island account, that sort</div> <div>17 of thing?</div> <div>18 A. No. To the best of my recollection, I</div> <div>19 did not.</div> <div>20 Q. How about any assets in Curacao? Have</div> <div>21 you ever heard that before?</div> <div>22 A. No.</div> <div>23 Q. Okay.</div> <div>24 A. I'm assuming -- I'm sorry. My</div> <div>25 geography is limited. I do know he visited</div> </div>



<div>93</div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Certification in Support of Turks and Caicos frequently. And I don't know if that -- I don't know where Curacao is, frankly.</div> <div>MR. CRISP: Same general region.</div> <div>THE WITNESS: Is it? Okay. So I'm not too far off.</div> <div>And then we held a management conference in St. Lucia. But I'm not aware of any assets or accounts in those countries.</div> <div>BY MR. VOSS:</div> <div>Q. Do you know of any of Daryl's personal assets?</div> <div>A. I'm sorry. Do -- can you --</div> <div>Q. Do you know of any personal assets that he has in his own name?</div> <div>A. I honestly, I mean I would assume his house. But I can't say that with any certainty. I don't know if it's in his name or not.</div> <div>Q. Sure.</div> <div>For this one, I definitely don't want you to guess. I'm not going to ask all these questions if you don't know the answers.</div> <div>A. I don't know the answer to that one.</div> <div>Q. Are you aware of him having a</div>	<div>95</div> <div>our offices. And I was shocked to learn some of the information that I was presented at this hearing. And I decided to resign after that.</div> <div>Q. What information in particular at the hearing shocked you?</div> <div>A. Leigh Danca, who I've met only once. Really, to the best of my recollection, I have met her like once or twice. And I always found her to be a very intelligent person and I know she does a lot of their operational stuff. And when she said that, I believe, I don't remember, but she said there was only like 10,000 machines under management and Daryl had been consistently saying it was a higher number than that. I think that was, yeah, that was a very concerning moment.</div> <div>MR. CRISP: You will see in the text messages sort of in that 4 or 5 December when all this came down. The epiphany was had around that time.</div> <div>MR. VOSS: I see.</div> <div>BY MR. VOSS:</div> <div>Q. Did he tell you personally there was more than 10,000 ATMs?</div>
<div>94</div> <div>girlfriend at any point in time?</div> <div>A. I have heard it from people. But, no, I'm not personally aware of that.</div> <div>Q. Did you hear any names?</div> <div>A. No.</div> <div>Q. Okay. Where did you hear that from?</div> <div>A. Rose hinted at it and she was pretty discreet as his assistant. And then honestly, unfortunately, I think the rest of it came from, I read a feed, which I wish I didn't have to read.</div> <div>MR. VOSS: Can I take just 30 seconds to meet with Samantha off the record? And I then I think we are about done.</div> <div>(A brief recess was taken.)</div> <div>BY MR. VOSS:</div> <div>Q. Can you tell me why you left Heller Capital?</div> <div>A. Yeah, I can.</div> <div>Q. And what is the answer?</div> <div>A. Yeah. I mean the FBI came to our offices, which is a clear indication that something is bad. And there was a hearing. And I think it was the contempt of court hearing around the same time the FBI came to</div>	<div>96</div> <div>A. That's a good question. Let me think about that for a second.</div> <div>To the best of my recollection, I believe he had suggested it was over 20,000 ATMs to me directly.</div> <div>Q. Did he ever suggest it was over 30,000?</div> <div>A. I don't think I ever heard over 30,000.</div> <div>Q. Did you ever hear 38,000?</div> <div>A. I believe I heard 20. I heard 25. And I think I might have even heard 27. But I don't remember anything over 30.</div> <div>Q. Who else do you think we should talk to to find Paramount assets?</div> <div>A. Brandon Hall.</div> <div>Q. Who is he?</div> <div>A. He was the director of finance under Dennis Ream.</div> <div>It sounds like you've already talked to Dennis Ream. So I wasn't going to name him.</div> <div>And then before Brandon was Brett -- can I look up the name really quick?</div> <div>I don't want to be rude. But I just need to</div>

<div> <div>Case 25-11354-JNP Doc 203-1 Filed 04/25/25 Entered 04/25/25 14:39:18 Desc Page 798 of 810</div> <div> <div>look at my phone.</div> <div>Brett Davis.</div> <div>Q. Brett Davis. He was at Paramount?</div> <div>A. He was the director of finance at Paramount before Brandon and then he moved over to PowerPoint.</div> <div>Q. Do you happen to know if these gentlemen are in Pennsylvania?</div> <div>A. To the best of my knowledge, they are both in Pennsylvania.</div> <div>Q. Okay. Anyone else?</div> <div>A. I mean Randall Leaman and Dennis Ream, of course.</div> <div>MR. CRISP: You were talking about Dan before, too, right?</div> <div>THE WITNESS: Dan Burkholder?</div> <div>MR. CRISP: Um-hmm.</div> <div>THE WITNESS: Yeah. I mean Dan was mostly the cultural. Like he was the president but he was mostly cultural. But he would speak with all of those people but I don't know that he would know much about their assets.</div> <div>From a Heller Capital perspective, assets coming into Heller</div> </div> </div>	<div> <div>97</div> <div> <div>25</div> <div> <div>Entered 04/25/25 14:39:18 Desc</div> <div>Page 798 of 810</div> </div> </div> <div> <div>Outside of that, I can't think of anything else that would be super helpful.</div> <div>Q. Okay. Those are all the questions I have. I appreciate your time today.</div> <div>A. Of course.</div> <div>MR. VOSS: We are off the record.</div> <div>(Deposition concluded at 2:47 p.m.)</div> </div> <div>99</div> </div>
<div> <div>98</div> <div> <div>1</div> <div>Capital, Barry Ryneearson was the CFO.</div> </div> <div> <div>2</div> <div>BY MR. VOSS:</div> </div> <div> <div>3</div> <div>Q. What assets do you think potentially still exist of Paramount?</div> </div> <div> <div>5</div> <div>A. I have no idea.</div> </div> <div> <div>6</div> <div>Q. Okay. The last one. What things do you think I should know if I were looking for assets? What would you want me to know if you wanted to help me find assets? Anything else that we have not covered, something that you thought we should have covered that but he didn't ask about it?</div> </div> <div> <div>13</div> <div>A. I mean you did ask about this. But to be clear, I mean the QuickBooks file at Heller Capital is a corporate file. And so all the other QuickBooks accounts fall underneath it for the Heller Capital managed entities. So I mean that's a good place to start from a financial perspective.</div> </div> <div> <div>20</div> <div>And then I would go into the sales for the database. I mean I know that bank account numbers were stored in there so that we didn't lose track of the hundred bank accounts that went along with special purpose entities.</div> </div> </div>	<div> <div>100</div> <div> <div>1</div> <div>DEPONENT: AARON R. FOGLEMAN</div> </div> <div> <div>2</div> <div>DATE: March 31, 2025</div> </div> <div> <div>3</div> <div>CASE: Prestige Fund A, LLC, et al, vs. Paramount Management Group, LLC</div> </div> <div> <div>4</div> <div>ERRATA SHEET</div> </div> <div> <div>5</div> <div>PAGE/LINE/ CHANGE OR CORRECTION AND REASON</div> </div> <div> <div>6</div> <div>---/---/-----</div> </div> <div> <div>7</div> <div>---/---/-----</div> </div> <div> <div>8</div> <div>---/---/-----</div> </div> <div> <div>9</div> <div>---/---/-----</div> </div> <div> <div>10</div> <div>---/---/-----</div> </div> <div> <div>11</div> <div>---/---/-----</div> </div> <div> <div>12</div> <div>---/---/-----</div> </div> <div> <div>13</div> <div>---/---/-----</div> </div> <div> <div>14</div> <div>---/---/-----</div> </div> <div> <div>15</div> <div>---/---/-----</div> </div> <div> <div>16</div> <div>---/---/-----</div> </div> <div> <div>17</div> <div>---/---/-----</div> </div> <div> <div>18</div> <div>---/---/-----</div> </div> <div> <div>19</div> <div>---/---/-----</div> </div> <div> <div>20</div> <div>---/---/-----</div> </div> <div> <div>21</div> <div>I have read the foregoing transcript of my deposition and, except for any corrections or changes noted above, I hereby subscribe to the transcript as an accurate record of the statements made by me.</div> </div> <div> <div>24</div> <div>Date: _____</div> </div> <div> <div>25</div> <div>Signature of Deponent</div> </div> </div>

3 I, Allen S. Blank, the undersigned Notary  
4 Public, do hereby certify that personally  
5 appeared before me, AARON R. FOGLEMAN, being  
6 by me first duly sworn to testify the truth,  
7 the whole truth, and nothing but the truth, in  
8 answer to the oral questions propounded to him  
9 by the attorneys for the respective parties,  
10 testified as set forth in the foregoing  
11 deposition.

12 I further certify that before the taking  
13 of said deposition, the above witness was duly  
14 sworn, that the questions and answers were  
15 taken down stenographically by the said Allen  
16 S. Blank, Reporter-Notary Public, Paradise,  
17 Pennsylvania, approved and agreed to, and  
18 afterwards reduced to print by means of  
19 computer-assisted transcription under the  
20 direction of the said Reporter.

21 In testimony whereof, I have hereunto  
22 subscribed my hand this 31st day of March,  
23 2025.  
24  
25

-----  
Allen S. Blank, RMR  
Reporter-Notary Public

My Commission Expires:  
November 26, 2025

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